2.5 PLEASANTON AREA COMMENTS

2.5.A QUESTIONS RAISED BY SPEAKERS AT THE MAY 9, 2000 MEETING: PLEASANTON, CA

1. What additional development would the expanded Vineyard Substation serve?

PG&E's Proponent's Environmental Assessment (PEA) states that the Tri-Valley area consists of three distinct distribution planning areas (DPAs):

- *San Ramon-Vineyard 21 kV*
- *Livermore 21 kV, and*
- *Tri-Valley 12kV.*

The PEA further states that the San Ramon-Vineyard DPA, served by the San Ramon and Vineyard substations, provides power to the cities of San Ramon, Dublin and Pleasanton, as well as unincorporated areas of Alameda and Contra Costa counties. According to the PEA, the following new and planned commercial and residential development account for the increase in electrical demand within this DPA:

- *Hacienda and Bishop Ranch business parks*
- *Ruby Hill, the Vineyard Specific Plan and the Bernal Property in Pleasanton*
- *The Santa Rita development in Dublin*
- *Schaefer Ranch and Dublin Ranch in Alameda County, and*
- *Windemere and Gale Ranch in Contra Costa County.*

The PEA does not state specifically what portion of these developments would be served from the Vineyard Substation.

2. Are the new homes that would be served by the Vineyard Substation located in San Ramon or Pleasanton?

PG&E's PEA states that the Vineyeard Substation currently serves customers in the City of Pleasanton and unincorporated areas of Alameda County. Based upon this, it is expected that the upgraded Vineyard Substation would serve new development in Ruby Hill, the Vineyard Specific Plan, and the Bernal Property (in Pleasanton).

3. Aren't all the additional power demands in the North Area and not in the South Area (Pleasanton)?

No. Please consult the answers to questions 1 and 2, above.

4. The CPUC should hold an additional scoping meeting because the room was full.

Although the meeting room at the Pleasanton Library was full, the CPUC is not aware of anyone having been denied entry to the meeting. Everyone at the meeting who wished to speak was given the opportunity to do so. Interested citizens have also had the opportunity to provide written comments, and many have done so. For these reasons, the CPUC does not agree that an additional scoping meeting should be held at this time.

5. Who is the "audience" for speakers at the scoping meeting?

The California Public Utilities Commission, which regulates investor-owned utilities such as Pacific Gas and Electric Company, sponsored these scoping meetings to hear comments from agencies, local governments and interested members of the public about what alternatives should be considered and what issues should be studied in preparing an environmental impact report (EIR) on PG&E's proposed Tri-Valley 2002 Capacity Increase Project. Therefore, the CPUC and its independent environmental consultant, Aspen Environmental Group (Aspen), who will prepare the EIR, are the primary audience for the speakers at the scoping meeting.

6. How many times has the CPUC approved an alternative over a proposed project? What percentage of

decisions approved alternatives?

The information requested in these two questions is not collected or maintained by the CPUC. However, beyond the requirements of CEQA that the Lead Agency consider alternatives to the proposed project (and provide a Statement of Overriding Considerations if an alternative found to be environmentally superior is not selected), a core value of the CPUC is the careful and thorough consideration of alternative approaches, which manifests itself throughout the agency's decision-making, not just in those matters involving CEQA.

A particularly relevant example of where the CPUC approved an alternative over the proposed project is the predecessor to PG&E's current proposal to build and operate a 230 kV transmission system in the South Area:

- ***1986**: PG&E's Application/PEA. Proposed project was 1.6 mi. of underground and 3.7 mi. of overhead. Proposed route was overhead, behind (the then-proposed) Ruby Hill, then underground along Vineyard into the substation.*
- ***7/87 CPUC** DEIR **followed by 10/87** FEIR. The EIR looked at the following alternatives:*
    - *Alt 1: Route 1, Option 1 (somewhat similar to current proposed, but more overhead): 4.7 mi total, with 1.2 mi. underground (underground is more towards Bernal than now, Kottinger Ranch was in planning stages but not yet built).*
    - *Alt 2: Route 1, Option 2 (<u>very</u> similar to current proposed but the overhead/underground transition station is closer to town): 5.1 mi total and 1.9 mi. underground.*
    - *Alt 3: Route 3, Option 2 (modification of the then-proposed Ruby Hill route): 5.6 mi total with 3.5 mi underground (the difference between this Alt. and the proposed was that this would hit Vineyard a little farther east).*
    - *Alt 4: Route 4 (Vineyard Ave. all the way to Tesla corridor (ending west of Sycamore Grove Park) - 5.6 miles long, <u>all</u> underground. This alternative was included in both the DEIR and FEIR but it was not fully analyzed for impacts. The Commission's Decision (see next item) says "since the all-U.G. Alternative 4 was advanced after environmental field work was underway on the other alternatives, it was not possible in the time available to conduct a complete environmental review… a Supplemental EIR will be required if all-U.G. Alternate 4 is selected" (and it was selected).*
- ***1/28/88 CPUC Decision**: CPUC granted a Certificate of Public Convenience and Necessity to PG&E for the "all-underground Alternate 4" (the "all Vineyard Avenue" route). The CPCN was subject to two conditions and some other requirements:*
    - *PG&E to comply with the FEIR's mitigation measures*
    - *PG&E to comply with any SEIR mitigation measures developed for Alt 4*
    - *PG&E was ordered to prepare a study comparing Alt 4 with the potential expansion of the San Ramon Substation (which PG&E said it would do rather than the all-underground alternative)*
    - *CPUC Staff was ordered to prepare a Supplemental EIR on Alt 4 within 90 days of receiving info from PG&E*
    - *PG&E was ordered to submit updated cost estimate*
    - *CPUC Staff was to review PG&E's cost*
    - *Authorization was good for two years (construction to begin within two two years)*
- ***12/14/89 CPUC Order**: On 6/28/89, PG&E submitted a request to extend the CPCN until 2001, but on 9/25/89, PG&E withdrew that request. As a result, the Application was dismissed.*

Another, more recent example, of where the CPUC approved an Alternative over the proposed project is the Santa Fe Pacific Pipeline expansion (1998), an underground petroleum products pipeline through densely-populated, urban southeast Los Angeles County. In this case, the Commission approved the "Environmentally Superior" alternative identified in the Final EIR (which was prepared for the CPUC by Aspen Environmental Group), which consisted of several segments of the applicant's proposed route and portions of five alternative route segments (for a 14.3 mile-long total pipeline).

7. Why aren't "human" impacts considered as important as plant/animal species?

Impacts on humans are considered important under CEQA, particularly health and safety impacts (such as air quality and hazardous materials), as well as issues such as noise, visual, traffic, and cultural resources, and effects on housing and public services. In fact, most of the issues which the CEQA Guidelines call upon agencies to consider in environmental impact assessment have to do with the potential adverse impacts on human activity, health/safety or infrastructure. A review of the questions asked in the standard CEQA Environmental Checklist (see Notice of Preparation, Appendix A), reveals this fact.

8. Why doesn't the PEA address the potential hazards of the underground transmission line?

PG&E's PEA was the starting point for the CPUC's CEQA process, and represents PG&E's assessment of the environmental impacts of its proposed project. The potential hazards (health and safety impacts) of both overhead and underground transmission lines will be considered in the EIR being prepared by the CPUC, based upon the independent analysis of its EIR team, led by Aspen Environmental Group and under the CPUC's direction.

9. What process does the CPUC use to balance community values with project costs and other impacts?

The balance of community values with project objectives, costs and other impacts occurs in two essential steps in the CPUC's decision-making process: First, in the EIR's "Comparison of Alternatives," in which the impacts identified for the Proposed Project and Alternatives are compared and weighed to identify the "Environmentally Superior Alternative" required by CEQA; this almost always involves weighting impacts to reflect the community values of the project area (e.g., air quality may be much more important in a densely urban project area than in a rural area), which are gleaned during Scoping and through continuing consultation with other agencies. Secondly, the CPUC is required by state law to balance community values, project need/objectives, project costs and other factors in its consideration of the entire record developed in the General Proceeding as well as the EIR, in order to render a decision on PG&E's application.

10. Why isn't PG&E available at this meeting to discuss alternatives?

Representatives of PG&E were present at the scoping meetings as observers and, if needed, to provide factual clarification in response to questions raised by attendees. The meeting was sponsored by the CPUC for the purpose of receiving scoping comments and questions from the public related to the CPUC's environmental analysis of PG&E's proposed project. Given the meeting's specific purpose, it would not have been appropriate for PG&E's representatives to defend or debate their proposed project or its alternatives.

11. Have/do Aspen/Urban Alternatives worked/work for PG&E?

No. As part of its competitive consultant selection process, the CPUC disqualifies any prospective contractors with any current business relationships with the Applicant (including any parent, affiliate or subsidiary), or that has provided any assistance to the Applicant or other parties in the subject CPUC proceeding (application).

12. What's the driving force behind PG&E's proposal for the southern route? How did they select this route?

PG&E's PEA (pp. 2-21ff.) notes that growing local demand on the Vineyard Substation requires reinforcement of that substation from a 60/21 kV substation to a 230/21 kV substation. The PEA notes that the Contra Costa-Newark 230 kV line, part of which is located in the Tesla-Newark corridor, is the closest transmission line with available capacity to serve the upgraded Vineyard Substation. According to Table 2-5, p. 2-21 of the PEA,

Contra Costa-Newark #2 circuit is best equipped to handle the additional loading. This explains why the endpoints of the route were selected – power demand at Vineyard Substation plus power availability on the Contra Costa-Newark 230 kV line. In Section 3.3.3 of the PEA, PG&E provides its rationale for selecting the specific southern route for its proposed project.

13. Is project information available on-line?

Yes. You can obtain information on the CPUC's CEQA process for this project, as well as PG&E's PEA, from the CPUC's project website at:
http://www.cpuc.ca.gov/divisions/energy/environmental/info/aspen/tri-valley/tri-valley.htm

14. Why wasn't the City of Pleasanton consulted on routing for the proposed project?

It is not the CPUC's role to comment on how well or to what extent PG&E consulted with the City of Pleasanton in preparing its routing proposal. However, it is the responsibility of the CPUC during scoping and preparation of the EIR to consult diligently and thoroughly with the City of Pleasanton and all other interested parties in preparing the EIR on the proposed project and its alternatives.

15. Who makes the decision on this project, the Commissioners or the ALJ (administrative law judge)?

After hearing evidence in the General Proceeding and considering the information developed in preparing the EIR on the proposed project and its alternatives, the ALJ will make a recommendation to the Commissioners about what to do (in the form of a Proposed Decision). The five Commissioners will make the final decision about whether to approve PG&E's application, and under what conditions (such as alternatives and mitigation measures) approval would be given.

16. Regarding the separation of the general proceeding from the CEQA process, why aren't community values evaluated in the CEQA process? In the general proceeding, how will community values be assessed?

Please see the response to Q. 9. In addition, the Assigned Commissioner's Ruling on the scope of the General Proceeding (April 26, 2000), provides relevant details: (see pp. 4-5)

Public Utilities Code Sections 1001 and 1002 provide the basic scope for the CPUC's General Proceeding. In addition to the determination of need underlying the grant of a Certificate of Public Convenience and Necessity (CPCN), Section 1002 provides in pertinent part that the Commission, as a basis for granting any certificate pursuant to Section 1001, shall give consideration to: a) Community values; b) Recreational and park areas; c) Historical and aesthetic values; and d) Influence on the environment. The CPUC's General Order 131-D further prescribes that prior to issuing a CPCN, the Commission must find that the project promotes the safety, health, comfort and convenience of the public. … The effect of a proposed facility on property values is not, per se, an issue within scope. However, in considering the aesthetic and community values affected by a proposed facility, the impact on property values is indirectly considered. The cumulative and/or growth inducing impact that the project might have is also a matter within the scope.

The Commission will consider information in the EIR, as well as testimony and briefs filed in the General Proceeding, and public comment gathered in Public Participation Hearings, to form its decision on this Application by PG&E. For more information about the CPUC's decision-making process, please contact the CPUC's Public Advisor at (415) 703-2074; or e-mail at: public.advisor@cpuc.ca.gov, and see the CPUC's website at http://www.cpuc.ca.gov/divisions/pubadv.htm.

17. What is Aspen's track record on evaluation of alternatives in comparison to proposed projects; what happens when an alternative is found to be environmentally superior to the proposed project?

In its ten-year history, Aspen Environmental Group has distinguished itself in the development of feasible alternatives to avoid or reduce impacts of proposed projects, and in the comprehensive analysis and comparison of alternatives and proposed projects. The project list is extensive, but especially relevant, recent examples are:

- *Northeast San Jose Transmission Reinforcement Project, Draft EIR prepared for the CPUC and published June 6, 2000. The Draft EIR considered five alternative routes to PG&E's proposed 230 kV, 7.3 mile transmission line (including an undergrounding alternative), two alternative sites for PG&E's proposed 230 kV substation, and two alternative routes to PG&E's proposed 115 kV upgrade (including an undergrounding alternative), in addition to the No Project Alternative. The alternatives screening process for this EIR evaluated 22 potential alternative routes or methods of providing increased power supply to the area. The Draft EIR found a combination of alternative and proposed project route segments to be environmentally superior in reducing the impacts of the proposed project to the greatest extent feasible. For more information on this Draft EIR, please see the CPUC's website at: http://www.cpuc.ca.gov/divisions/energy/environmental/info/nesanjo.htm.*

- *Bolsa Chica Water Line and Wastewater System, Final Supplemental EIR prepared for the CPUC and published April 2000. The Draft SEIR initially considered nine alternatives to the proposed project (6.7 mile water pipeline and associated infrastructure proposed by a CPUC-regulated water utility), selected through an analysis of alternative pipeline alignments and alternative water sources and from input received from the public and local jurisdictions during the scoping process. Four alternatives, in addition to the No Project Alternative, were ultimately evaluated in the Draft and Final SEIR. The SEIR concluded that the closest feasible alternative for water service for the Bolsa Chica Planned Community, connection to the City of Huntington Beach water supply and distribution system, would be the environmentally superior alternative. For more information on this Draft EIR, please see the CPUC's website at:*

  http://www.cpuc.ca.gov/divisions/energy/environmental/info/aspen/bolsachica/bolsa.htm.

The Draft and Final EIR will identify the Environmentally Superior Alternative; if the Environmentally Superior Alternative is the No Project Alternative, CEQA prescribes that the EIR also identify an environmentally superior alternative among the other alternatives. The EIR is an informational document for agency decision-makers (the five CPU Commissioners) to consider, along with the rest of the General Proceeding's record. If the Commission approves something other than the Environmentally Superior Alternative identified in the Final EIR, it must state why in a "Statement of Overriding Considerations" included in its decision document.

18. What needs to happen to get this project stopped?

The purpose of preparing an EIR is neither to "stop" nor to promote a specific project, but rather to analyze a project and its alternatives in sufficient detail so that the public and decision makers are fully informed about the likely impacts of that project and its alternatives. Decision makers then can decide what to do based on this knowledge. In that sense, the best way to "stop" any project would be to participate in the process and identify an alternative or alternatives that can accomplish the project's objectives with less significant environmental effects and at a reasonable cost.

19. When will the EIR alternatives be made public?

After reviewing the PEA and input from participants during the scoping process, and conducting an independent technical review, the CPUC and Aspen have determined a range of reasonable alternatives to be evaluated in the EIR. Please see Section 3 for a summary of the results of the CPUC's alternatives screening process.

20. Does Aspen have sufficient funding to evaluate a large number of alternatives?

The CPUC is committed to providing sufficient funding to its EIR consultants to comply with CEQA's requirement for the evaluation of a "range of reasonable alternatives" in the EIR, which can feasibly and effectively avoid and/or reduce significant impacts associated with a proposed project.

21. What is the process for appealing a CPUC decision?

Excerpted from the CPUC's "Guide for Intervenors"
(http://www.cpuc.ca.gov/interven99/overview_of_procedural_events.htm):

*If a party to a proceeding (or a nonparty with financial interest, such as a utility shareholder) believes the Commission's decision contains a legal error, then they may apply for rehearing. The application for rehearing must be filed within 30 days of the date the decision is issued (mailed to the parties). The Commission considers applications for rehearing in Executive Session, the closed portion of its regular meeting. It may deny an application for rehearing in whole or in part, clarify or modify the original decision, and/or order additional hearings. When the Commission issues a decision on an application for rehearing the applicant may, within 30 days of the date the decision is issued (mailed), file an appeal in the form of a petition for a writ of review (known as **certiorari**) with the California Supreme Court, or in adjudicatory proceedings, with the Court of Appeal.*

For more information about the CPUC's decision-making process, please contact the CPUC's Public Advisor at (415) 703-2074; e-mail: public.advisor@cpuc.ca.gov, and see the CPUC's website at http://www.cpuc.ca.gov/divisions/pubadv.htm.

22. What is Aspen's experience evaluating 230kV underground lines through residential areas? How will Aspen know about the technology being proposed?

Aspen itself has recent experience in evaluating a 230 kV underground transmission in preparing the Northeast San Jose Transmission Reinforcement EIR (see response to Question 30). As on that team, Aspen's Tri-Valley EIR team includes two key technical specialists in electric power system engineering:

- ***Paul Scheuerman, P.E. of Scheuerman Consulting** has over 30 years of professional experience as an electrical engineer in the electric utility industry. Similar to his role on the current Northeast San Jose Reinforcement Project EIR, Mr. Scheuerman is a valuable technical resource for project description and alternatives analysis, as well as the issues of purpose and need and system reliability as they relate to project objectives and utility systems impacts. His utility experience includes system operations studies, load forecasting and distribution, transmission and interconnection planning, and resource feasibility analyses. He is experienced in system reliability analyses, and has assisted in alternatives analyses in transmission system planning. His transmission system planning experience includes 500-, 230-, 138-, and 69-kV systems, and includes evaluation of various operating scenarios. He has also planned electricity distribution systems for suburban areas.*

- ***Charles Williams, P.E., of R.W. Beck**, has over20 years of experience in power transmission line planning, routing, design and construction. As for the Northeast San Jose Reinforcement Project EIR, Mr. Williams will provide the Aspen Team with EMF modeling and effects analysis expertise as well as assessment of other potential hazards. He served on the Washington State Legislature's EMF Task Force Technical Committee and he has completed EMF measurement and analysis for several transmission projects. His project experience also includes serving as Project Engineer for the Alameda 115kV Project, in which overhead, underground, and submarine alternatives were evaluated for crossing the Oakland Estuary.*

*The internationally-known electric services engineering firm represented by Mr. Williams (and until recently, Mr. Scheuerman), **R.W. Beck,** provides a "deep bench" of expertise in transmission systems analysis, system reliability, EMF analysis and mitigation, and evaluation of transmission routing alternatives (including submarine alternatives). In October 1987, RW Beck prepared a report for the CPUC titled "Technology and Environmental Assessment Guide on Underground HV Power Transmission," as part of the previous "Vineyard 230 kV Transmission Line" proceeding discussed in the Response to Question 19. The CPUC tentatively plans to have RW Beck update this report for the current, Tri-Valley 230 kV proceeding, including use of solid dielectric cable; the 1987 report included the following sections:*

- *Types of Underground Transmission Systems*
- *Cable Applications and Selection*
- *Cable System Details*
- *Construction and Installation*
- *Operation and Maintenance*
- *Economic Evaluation*
- *Environmental Considerations*
- *Future Trends*

- *Appendices: Utilities contacted, manufacturers contacted, performance/trouble data, European data, glossary*

23. What tests will be run on the proposed cables in the EIR? How will reliability be assessed? How will the EIR evaluate the safety of the proposed line?

As described in the foregoing response (#22), the Aspen Team includes highly qualified and experienced specialists to evaluate the design, construction and operation of the proposed 230 kV system, as well as alternatives. The Aspen Team will evaluate the potential of the proposed project (and alternatives) to improve electrical service reliability, including a project's potential to prevent interruptible service and avoid a total blackout, prevent residents from being denied regular service, and consider how increasing redundancy in delivery may improve service recovery in the event of a catastrophic outage. We will also consider how the Proposed Project could improve the operational dependability over the existing system, increase tolerance to non-persistent disturbances, and improve maintainability of the voltage. We will compare when the peak periods occur against the existing level of available delivery service to verify when the additional capacity is needed. The Aspen Team will evaluate the option of controlled interruption for improving reliability, which could offset the need for the Proposed Project. As applicable, we would address the relationship of the proposed project to the North American Electric Reliability Council, Western Systems Coordinating Council, and California Independent System Operator criteria.

In general, the operation of high-voltage transmission and power lines has the potential to create corona (ionized air close to conductors that results in a partial discharge), induced current effects (metallic objects close to transmission lines begin to conduct a current), and magnetic fields (produced whenever electrical current flows in a conductor). Corona noise will be evaluated in the noise section of the environmental document. The small electric currents that are induced by electric fields would be evaluated based on reasonably worst-case assumptions (the object is perfectly insulated from ground, located in the highest field, and touched by a perfectly grounded person).

With regard to electric and magnetic field (EMF) analysis, PG&E's data on magnetic field strengths will be reviewed in accordance with CPUC Decision 93-11-013. The Aspen Team will evaluate proposed "no cost" or "low cost" magnetic field reduction steps for the Proposed Project and propose additional measures if warranted. Our EMF expert, Chuck Williams, P.E., of R.W. Beck, has evaluated EMF reduction mitigation measures that have included split bundle phasing, low reactance phasing, narrow profile construction, passive and active cancellation loops, underground alternatives, and other variations. Aspen would present such mitigation measures in terms of EMF reduction and incremental construction costs. Because of public concerns regarding possible magnetic field health effects, Aspen's team would be prepared to discuss these issues with the public and be able to explain the most current scientific literature and agency policy.

24. Does Aspen simulate model cable operation?

No. See also the responses to questions 22 and 23 to learn more about Aspen's capabilities and the type of EIR analyses to be performed on the proposed underground cable.

25. What is the legal definition of an alternative? Do all alternatives need to be submitted by May 22 (end of scoping)? How are alternatives generated?

The term, "alternative," is not specifically defined in Chapter 2.5 of CEQA. However, alternatives are described in CEQA Guidelines Section 15126 (d) as (actions) which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of its significant effects. CEQA Section 21061 notes that an environmental impact report is prepared to provide decision makers and the public information about the effects a proposed project is likely to have on the environment, to list ways in which the significant effects of that project might be minimized, and to indicate alternatives to that project.

California courts have ruled that reasonable alternatives be considered even if these are submitted after the close of scoping. In the interest of efficient and effective government decision-making, the CPUC seeks to have constructive EIR scoping periods, during which feasible and effective alternatives to avoid or reduce significant

impacts of the proposed project are proactively sought out by its EIR Team. The Proponent's Environmental Assessment (PEA) required by CPUC Rule 17.1 to be filed with the application, is the first step in the CPUC's consideration of alternatives, but the process continues with agency consultations and public input during the scoping period. The project team will meet and screen all suggested alternatives for feasibility in order to identify a "range of reasonable alternatives" to be analyzed in the EIR. The EIR will identify any alternatives considered by the CPUC, then rejected as infeasible, and briefly explain the reasons underlying their rejection.

26. How can the public be expected to develop alternatives in two weeks?

The public does not need to describe fully developed alternatives before the end of the scoping period. While it is helpful to the environmental consultant to have specific alternative suggestions, the public need only describe in concept the alternatives they would like to see analyzed in the EIR. It is Aspen's job and ultimately the CPUC's responsibility to fully describe the specific alternatives to be analyzed in the EIR.

27. Is Aspen bound by the suggestions received during scoping?

Aspen is not bound by the suggestions received during scoping. Aspen and the CPUC, however, are required to consider all suggestions thoroughly. If suggested alternatives are not retained for detailed study in the EIR, then Aspen/CPUC must provide a rationale for removing those alternatives from further consideration.

28. Will an alternative be considered that "beefs up" existing lines (60kV lines)?

Please see Section 3 for a summary of the results of alternatives screening.

29. Why aren't EMF and other electrical hazards included on the CEQA initial study checklist included in the NOP?

EMF and other electrical hazards were not included in the environmental checklist in the NOP, which was drawn from the CEQA Guidelines as a model checklist. However, Table 1 on pages 7 and 8 of the NOP does list EMF and other safety concerns under "Other Issues" as one of the potential impacts/issues to be studied in the EIR:

- *There is public concern about Electric and Magnetic Field (EMF) effects of the aboveground and underground transmission lines*
- *Residents in the southern area of the proposed project are concerned about safety and engineering feasibility of the proposed use of dielectric cable for the underground portion of the 230 kV transmission line*
- *Concern about the location of the transmission line near schools and residential areas.*

30. Will the Scoping Report be available to the public?

Yes. See subsection 1.4 in the introduction to this Scoping Report for information about where the Scoping Report will be available for public review.

31. Is this the only meeting at which the public can speak on this project?

There were three meetings scheduled for public scoping input: the meetings in Dublin and Livermore on May 8th and the meeting in Pleasanton on May 9th. The CPUC and its environmental consultant have also met with agencies and local government representatives to hear their concerns. These were the only meetings scheduled for the scoping phase of this project. The CPUC tentatively plans to hold public informational meetings on the Draft EIR in the project/alternatives area in early December, 2000, followed by one or more public hearings on the Draft EIR and PG&E's application tentatively scheduled for January, 2001. Other public meetings may be scheduled in the future. All further CPUC public meetings on this EIR will be noticed to the project mailing list, as well as in local newspaper advertisements and on the CPUC's EIR website and recorded telephone hotline.

32. If the CPUC approved the project, does PG&E also need local permits to construct the project?

PG&E would not require discretionary local permits to construct if the CPUC were to approve this application, since the CPUC has primary jurisdiction over the construction, maintenance and operation of PG&E facilities in California. PG&E would still have to obtain all "ministerial" building and encroachment permits from local jurisdictions. The CPUC's authority does not pre-empt special districts, other state agencies or the federal government.

33. Who is Aspen? Describe the company and staff.

Aspen Environmental Group is a small environmental consulting firm in business since 1990, with offices in southern California and San Francisco. Aspen has had demonstrated success in managing large and complex as well as small and specialized environmental projects. Aspen has assembled a group of experts in environmental science and engineering, supplemented by a network of carefully selected associates who are well known in all aspects of environmental assessment, management, and compliance. Aspen offers environmental consulting and management services in the following areas:

Environmental Impact Assessment
System Safety and Technology Evaluation
Public Participation and Community Involvement
Mitigation Monitoring, Compliance, and Permitting
Environmental Compliance and Permitting
Air Quality Modeling and Impact Assessment
Air Toxics Inventory and Health Risk Assessment
Biological Surveys and Impact Assessment
Environmental and Habitat Restoration

Aspen Environmental Group is dedicated to continuous improvement in the understanding of the relationships between human activities and the environment. We are committed to providing practical solutions in support of a strong economy and industrial progress, based on the principles of sustainable use of Earth's resources and maintenance of a safe and healthy environment. For more information about Aspen, please see our website at: www.AspenEG.com.

34. Does Aspen have an M.D. on staff? How will EMF impacts be evaluated?

Aspen does not have an M.D. on staff. See also the responses to questions 22, 23, and 35 to learn more about Aspen's capabilities and the scope of the analyses of EMF impacts to be performed in the EIR.

35. How will Aspen decide whether the line could cause cancer or not?

The CPUC and Aspen, as its EIR contractor for this project, will not examine whether the new line/substation could "cause cancer." This is an extremely complex question for which there is no clear answer at the present time. In 2001, the California Department of Health Services EMF Program, funded at CPUC direction in 1995, will produce a report on EMF Risk Evaluation. Until that time, the CPUC will continue to observe "prudent avoidance" policies and low/no cost EMF reduction measures.

For more information on the California Department of Health Services EMF Program, visit ***www.dnai.com ~ emf/.***

36. How was Aspen selected by the CPUC?

Aspen was selected through a competitive process in which environmental companies had the opportunity to submit their qualifications for review and then take part in interviews conducted by CPUC staff. At the end of this process, Aspen was selected to prepare the EIR for the Tri-Valley Project.

37. Could another meeting be held to discuss/present alternatives to PG&E's proposed project?

At this point the CPUC is not planning to hold additional public meetings to present and discuss alternatives. However, it has continued agency consultation with the Tri-Valley municipalities, Alameda County and the East Bay Regional Park District in its screening and development of alternatives for the EIR. The results of this screening and development process may be found in Section 3 herein. After this report has been published and digested by the public as well as other agencies and jurisdictions, the CPUC will continue to consult with other agencies and evaluate whether additional meetings with the public are needed for preparation of the Draft EIR.

38. How many people at Aspen will be working full-time on this project?

The Aspen Team for the Tri-Valley EIR includes over 16 project management and technical specialist personnel. As with any project-type work, the Team's work fluctuates between full-time (if not overtime) and "standby" depending on the stage of the project and the individual's role. As we move into Draft EIR preparation, most of the Team will be engaged for the majority of their time for the next few months.

39. In the evaluation of alternatives, are competitors to PG&E considered (e.g., local generation)?

Yes, local generation has been considered as an alternative for the EIR; please see Section 3 for a summary of the results of alternatives screening.

40. Could the community meet with PG&E to understand why they chose this route and their alternatives? (PG&E representative said he'd check with legal and CPUC to see if that would be OK)

The CPUC cannot answer for PG&E. The Commission does, however, encourage PG&E and the other utilities it regulates to be diligent and accommodating in their public outreach and consultation.

41. Is the CPUC subject to the Brown Act?

The CPUC is subject to the Bagley-Keene Act, which has similar objectives for California state agencies as the Brown Act has for local jurisdictions in California (open government). As an agency founded in 1911 during Governor Hiram Johnson's "reform" administration, the CPUC has a long tradition of making its decision-making accessible to interested/affected parties and to the public. As already suggested in this Q&A, readers interested in further information about the CPUC's procedures and process are urged to contact the CPUC Public Advisor at (415) 703-2074; e-mail: public.advisor@cpuc.ca.gov, and see the CPUC's website at http://www.cpuc.ca.gov/divisions/pubadv.htm.

TABLE 2.5.B SUMMARY OF SPEAKERS' ORAL COMMENTS PRESENTED AT THE MAY 9, 2000 SCOPING MEETING: PLEASANTON, CA

Alphabetical Index of Commenters for Table .5.B

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA

#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
1		Randy Lum, Director of Public Works, City of Pleasanton	City of Pleasanton requests that the CPUC evaluate routes around developed areas rather than through them.		X		The alternative you suggested was thoroughly considered for study in the EIR by the CPUC during scoping. Please see Section 3 of this Scoping Report, Alternatives Screening Results, for a summary of the alternatives selected/not selected for study in the EIR and the reasons for these decisions.
2	A	Chris Hilen, legal representative for the Kottinger Ranch Homeowners Association	Mr. Hilen filed a protest to the application and is filing a scoping letter.	NA	NA	NA	Please see Communication No. 10, in Table 2.5.C for a summary of Mr. Hilen's written comments.
	B		In this area, PG&E froze (local residents) out of the process.			NA	No matter what occurred during PG&E's process in preparing its submittal to the CPUC, the CPUC is and will be actively seeking input from ***all*** interested members of the public during scoping and preparation of the EIR on the proposed Tri-Valley Project.
	C		Impacts to humans are part of the CEQA process.	X			Please see response to question 7, Section 2.5.A.
	D		PG&E's proposal to underground nearly 3 miles of 230 kV line is unprecedented; it's very unusual to put 230 kV (transmission line) through a residential neighborhood. This is inherently dangerous technology and it should not be in residential areas.	X			Alternatives to routing the transmission line through residential areas have been considered for inclusion in the EIR (see Section 3). The potential health and safety effects of underground 230 kV transmission cable located in residential neighborhoods will be assessed in the EIR.
3	A	Becky Dennis, Pleasanton City Council	Concerned about PG&E's lack of coordination with the City of Pleasanton. CPUC should consider developing alternatives with City input; the City is here to help and offered to work with PG&E, but PG&E did not accept.	X		NA	See responses to items 2B and 2D in Table 2.5.B. Note that the CPUC has followed up the Scoping period with ongoing consultations with Tri-Valley municipalities, Alameda County and the East Bay Regional Parks Districts.

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
3	B	Becky Dennis, Pleasanton City Council, cont.	Could there be an additional scoping meeting? There were some noticing problems with this meeting.			NA	The CPUC has not scheduled an additional scoping meeting at this time. The large number of attendees at the meeting on May 9th plus the large number of written submittals received by the CPUC indicate widespread community awareness of and participation in this process.
4	A	Will Evangelista, resident, Palomino Place, Palomino at Bernal, Pleasanton	I spoke to 30 homeowners in my area; there's lots of opposition to the project from areas besides Kottinger Ranch			NA	No change in scope as a result of this comment opposing the proposed project.
	B		PG&E failed to consider community values, as required, and didn't inform property owners.			NA	Community values will be considered in the CPUC's decision process; also see response to item 2B in Table 2.5.B.
	C		Recognizes the need for expanded capacity, but given the limited experience with 230 kV lines, the risks are not worth it. Alternatives need to be considered.	X			See response to item 2D in Table 2.5.B.
5	A	Doug Evans, Kottinger Ranch homeowner, Pleasanton	Encourages CPUC/Aspen to look at alternatives to the proposed underground transmission line. Transmission lines fail; explosive failures can occur. These risks are ludicrous in a residential area.	X			See response to item 2D in Table 2.5.B.
	B		Construction impacts are also a problem -- permanent damage to streets will occur, traffic will be difficult	X			The construction impacts of the proposed project and its alternatives will be analyzed in the EIR.
	C		- and underground utilities would be damaged. A split of the neighborhood will result. People will move out of the neighborhood.	X			Potential impacts on land use will be analyzed in the EIR.
	D		These lines are unreliable, according even to PG&E; they require ongoing maintenance.	X			The reliability of the underground transmission lines, including potential impacts from frequency of repair, will be evaluated in the EIR.
5	E	Doug Evans, cont.	The EMF impacts will be significant because PG&E won't be able to stay within their EMF Plan due to the required turns and bends in the line.	X			Potential EMF impacts from both overhead and underground transmission lines will be analyzed in the EIR.

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
6	A	Ed Patriquin, President, Kottinger Ranch Homeowners Association, Pleasanton	Flaws in the power system in the Tri-Valley area have caused the problems that now exist; these flaws should not be carried forward. If the load to be served is the Hacienda Business Park and development in North Pleasanton, then a new substation should be located there.			X	Please see Section 3 of this Scoping Report, Alternatives Screening Results, for a summary of the alternatives selected/not selected for study in the EIR and the reasons for these decisions. It is not economically feasible to ignore the Vineyard Substation as a transmission and distribution hub in the Pleasanton area.
6	B		This area of Pleasanton was not consulted in PG&E's process, even though PG&E consulted with many people in the Tri-Valley area.			NA	See response to item 2B in Table 2.5.B.
	C		What is the need for the project? There's little growth planned for Pleasanton. Because of growth in San Ramon, PG&E wants to redirect power and send it there, requiring the Pleasanton area to accept this project.			X	Please see response to item 6A in Table 2.5.B.
	D		PG&E is not consistent in its approach to undergrounding: for North Livermore they say that underground (transmission cable) is unreliable; for Pleasanton, they say it's reliable. Our power system should not be put at risk.	X			Insofar as underground cable's reliability could affect both the human and natural environment in which it is installed, this issue will be studied in the EIR.
	E		PG&E says the underground line would not be dangerous. On August 19, 1999, an underground cable exploded at the SF airport, blowing a manhole cover over 100 feet in the air. Some houses are closer than 50 feet to the proposed line. Children playing in the streets could be hurt. The line should go through open space or industrial areas.	X			Hazards/threats to human health and safety will be analyzed in the EIR. Alternatives to the proposed project will also be evaluated. (See Section 3).
	F		What about fire potential from the transition structure, located in a dry brush area?	X			Potential hazards will be analyzed in the EIR.
6	G	Ed Patriquin (Cont'd)	Consider alternatives including: • Arroyo substation and new substations closer to load (Bernal Property and Dublin's housing) • A new substation in San Ramon or Dublin • Other underground routes, including open space	 X	 X X	X	Alternative substation sites and transmission line routes here have been considered for inclusion in the EIR. (See Section 3 for results.)

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
			between Pleasanton and Livermore.				
7		Susan Smith, Pleasanton	Concerned about quality-of-life issues. She lives adjacent to the proposed route and has a young daughter. This is a residential area with a community of families. Health should be a major factor in the EIR.	X			Human health and safety and other impacts on "quality of life," such as impacts from construction or traffic impacts, will be evaluated in the EIR.
8	A	Ed ? [inaudible]	Aspen needs to consider EMF impacts in residential areas; most EMF studies evaluate impacts of overhead lines and not underground lines. Consider induced current impacts for the road used: would bicycle wheels create a shock? What about lawnmowers?	X			Potential EMF impacts, particularly on health and safety, will be evaluated in the EIR.
	B		Residents of this area should not have to be test subjects for impacts and mitigation for underground high voltage lines. The street is essentially a playground in this area.	X			The potential impacts of underground cable on specific activities that might be common in a residential area will be evaluated.
9	A	Carla Brown Belcher, Pleasanton	PG&E has lied to the media in their statements about this area being filled with "NIMBYs." The people here want the line in open space, not in other people's neighborhoods.		X	NA	Labelling participants in any way will not contribute to the preparation of an effective EIR. Your input, however, will be most helpful. See also response to item 1 in Table 2.5.B.
	B		PG&E's process to develop the route was unfair and should be dismissed; they did not evaluate all possible routes.			NA	See response to item 2.B., Table 2.5.B.
	C		Consider a route that is through open space to Vineyard and follows the existing 60 kV line along Stanley.		X		See response to item 1 in Table 2.5.B.
9	D	Carla Brown Belcher, Pleasanton, cont.	The proposed route is not acceptable to local planning agencies; this should be considered under community values. Aspen should consider the humanistic view: people come first. They don't want to be another Hinkley (reference to the movie "Erin Brockovich").	X		NA	No change in the scope as a result of this comment opposing the proposed alignment. The CPUC will take community values into account in comparing the alternatives to be studied in the EIR in accordance with the requirements of CEQA.
10	A	Glenda	I recently bought a house here and would not have			X	As prescribed by CEQA, the EIR will not analyze the

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
		Schwem, Benedict area, Pleasanton	bought it if I had known about this proposed project. This project would result in economic ruin for homeowners because housing prices would drop.				potential economic impacts of the proposed project and its alternatives, except insofar as these might have physical effects or might indicate the significance of physical effects such as preclusion of an allowed land use.
	B		Safety is a bigger issue. There are small kids around, and explosion is possible. Don't put this in other people's yards but where people do not live.	X			See response to item 2D in Table 2.5.B.
11	A	Bing Hadley, Pleasanton	This 230 kV buried line is unprecedented and should not be allowed. There are only a couple other areas where they exist: Denver, in a thoroughfare parkway, and here. I have talked to several engineers in other utility companies and they all say that they would not route a line like this through a residential area. Some say it would have to be buried over 5 feet deep, others say 6-8 feet deep and away from populated areas. Some say all parties should be consulted first. Put the line in major arterial roads.	X			See response to item 2D in Table 2.5.B.
	B		Put the buried electric line in major arterial roads.		X		See response to item 1 in Table 2.5.B.
12	A	Dr. Douglas Huey, PhD in electrical engineering, Pleasanton	Concerned about (1) design safety, (2) health issues, and (3) PG&E's credibility. This (dielectric cable) is a new technology and PG&E has only 400 feet of experience with these lines and wants to impose it on these citizens. Dielectric insulation can fail, resulting in arcing as a result of water in the soil or physical damage. The line cannot bend around sharp corners without damage. How many people could be injured or killed?	X			The potential hazards and safety impacts of buried dielectric cable will be evaluated in the EIR.
	B		The NIEHS study says there is weak evidence about EMF health impacts, but they also say that there is no consistent explanation for higher incidence of cancer near lines. Is the CPUC going to be like the Air Resources Board was for MTBE use?			X	The potential health impacts of EMF will be evaluated in the EIR. Please see response to Questions 23 and 35 in Section 2.5.A.

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
13	A	Larry Snyder, Pleasanton	This is a huge family area where people are raising kids. This project is a nightmare and alternatives must be considered. He asks CPUC/Aspen to "trust but verify" in their relationship with PG&E; don't accept their information at face value.	X			Aspen has many years' experience in preparing EIRs on projects such as these. It is the CPUC's responsibility to take no one's assertions on faith, but rather to weigh information independently in preparing the EIR. However, the CPUC will also examine PG&E's program carefully in its General Proceedings.
	B		Evaluate substation alternatives also.			X	See response to item 6A in Table 2.5.B.
14	A	Randy Lum, Director of Public Works, City of Pleasanton	If PG&E had accepted the concept of community values, this meeting wouldn't have to happen.			NA	Whether or not PG&E had accepted the concept of community values, the CPUC would have held a scoping meeting in Pleasanton.
	B		There are few examples of this underground technology in the US; is it safe? Consider that there are people living here now who should not have this imposed on them, as opposed to when a line is installed before people live there (they move to the area knowing that the risk exists.)	X			See response to item 12A in Table 2.5.B
14	C	Randy Lum, City of Pleasanton, cont.	Work with the City to develop alternatives.		X		CPUC/Aspen have met with City of Pleasanton staff to identify further their concerns and to gather specific information for developing alternatives for study in the EIR.
15		Jim McFeely, Pleasanton	The PG&E proposal is just the shortest line between two points. Other routes may be more expensive or longer, but would not be through existing residential neighborhoods.		X		See response to item 1 in Table 2.5.B.
16		Jacqueline Evans, Pleasanton	The Vintage Hills Elementary School is near the route and there would be a danger to kids walking to school, both during construction and maintenance and during operation.	X			Health and safety impacts related to the construction, maintenance and operation of the proposed project and its alternatives will be evaluated in the EIR.
17		Christa Freihofner, Concerned Citizens Against	Concerned about alternatives that would require expansion of the San Ramon Substation. Each city should carry its own load. (San Ramon Substation currently serves 30% of Pleasanton's demand.) All		X		See response to item 1 in Table 2.5.B.

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
		EMF, San Ramon	cities should bear the impact of their own electricity need.				
18		Kelly Brodbeck, United American Energy (UAE), San Ramon	Distributed generation alternatives should be considered. This project does not need to be built. UAE has spent $120,000 studying the area's power demands and will submit a proposal to the CPUC for construction of small generation facilities adjacent to the Vineyard Substation. UAE is interested in pursuing local generation.		X		A "local generation" alternative has been considered for study in the EIR. (See Section 3).
19		Garrett Smith, Cogentech, Portland, OR	*(He represents distributed generation firms and is a licensed mechanical engineer.)* Safe, clean, efficient energy systems are available. Consider more than just transmission routes; look at distributed generation, which is used throughout the world. PG&E's alternatives are all transmission and distribution based, but private industry could solve these problems with socially responsible development.		X		See response to item 18 in Table 2.5.B.
20		David Lavigni, Kottinger Ranch, Pleasanton	Since the electricity market was deregulated, companies need to expand to get rate hikes. This proposed project may not be what PG&E even wants, but it may be after something less. Is the project even necessary? Why is the proposal on the table?			X	The focus of the CEQA review is not to assess project need, but the potential environmental impacts of PG&E's proposed project. The CPUC will assess the need for the project in the General Proceeding.
21		Laura Wu, Ruby Hill resident, Pleasanton	Supports evaluation of alternative routes and non-transmission alternatives.		X		See response to item 1 in Table 2.5.B.
22		Mark Weckwerth, Pleasanton	PG&E has justified its proposed routes by their cost effectiveness, but the possibility that the costs will be borne by the community must be considered. This is the most expensive housing in Pleasanton. If property values decline, there will be a tax loss to the City of Pleasanton and homeowners will lose value in their homes.			X	See response to item 10A in Table 2.5.B.

TABLE 2.5.B SCOPING MEETING ORAL COMMENTS: PLEASANTON, CA							
#	C	Commenter	Comments/Items Suggested For Incorporation in EIR/EIS Scope	Status of Suggested Scope Item			Responses/Remarks
				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
23		Bill Toman, Calpine	The California Independent System Operators (ISO) issued an RFP for distributed generation in this area, but the four proposals submitted were rejected due to lack of financial responsibility and other factors. The ISO is the manager of the grid. The ISO's process should be considered in the EIR.	X			As part of its consultation for this EIR, the CPUC will continue to consider the relevant/related processes of other entities. The CPUC will also be considering the ISO's input in its General Proceeding for this project.
24		Unidentified speaker from the back of the room.	Cumulative impacts should be evaluated: could small damage to the line's insulation cause impacts to gas lines, TV cable, DSL lines and other buried utilities? The EIR should consider this.	X			The CPUC will analyze potential impacts to other buried utilities in its analysis of the proposed project and its alternatives in the public services/utilities section of the EIR.

TABLE 2.5.C SUMMARY OF WRITTEN AND TELEPHONED COMMENTS SUBMITTED BY THE PUBLIC: PLEASANTON, CA AREA CONCERNS / ISSUES

Alphabetical Index of Commenters for Table 2.5.C

Alphabetical Index of Commenters for Table 2.5.C		
Source	**Community/Organization**	**Page**
Adil M. & Rohan A. Daruwala; Sona Chawla	Pleasanton Residents	60
Ronald Davis	Pleasanton Resident	60
Raymond & Elaine Del Franco	Pleasanton Residents	60
B.S. Denhoy	Pleasanton Resident	60
Robin A. Despotes	Pleasanton Resident	60
Edward C. & Carolyn L. Dougery	Pleasanton Residents	60
Warren & Joanne Dumanski	Pleasanton Residents	60
EMJ (Earl?)	Pleasanton Resident	60
Caryn & Will Evangelista	Pleasanton Residents	63
Mike & Jacquelyn Evans	Pleasanton Residents	63
Douglas & Donna Evans	Pleasanton Residents	63
Marla & Dan Filippi	Pleasanton Residents	63/72
Donna & Thomas Fristoe	Pleasanton Residents	60
John Glenn	Pleasanton Resident	60
Steve Glovin	Pleasanton Resident	60
Jonathan & Patricia Gochoco	Pleasanton Residents	60
Bill Green	Pleasanton Resident	60
Jon & Cindy Gruden	Pleasanton Residents	60
Pierre & Anne-Marie Guebels & Family	Pleasanton Residents	60
Laura & Bing Hadley	Pleasanton Residents	63
Ron & Ester Hart	Pleasanton Residents	63
Kirk & Hilda Hasserjian	Pleasanton Residents	60
Mary Pat Hawkins	Pleasanton Resident	60
Parris & Andrea Hawkins	Pleasanton Residents	63
Gary & Carol Heil	Pleasanton Residents	60
Carolyn Herb	Pleasanton Resident	60
Christopher A. Hilen	Law Firm of LeBoeuf, Lamb, Greene & MacRae, San Francisco (for KRHA)	76
Robert & Christi Hilton	Pleasanton Residents	60
Jan & Craig Hope	Pleasanton Residents	60
Allen House	Pleasanton Resident	63
Dr. Douglas C. Huey	Pleasanton Resident	66
Michael Hunter	Pleasanton Resident	60

Alphabetical Index of Commenters for Table 2.5.C		
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G.A. Jones	Electrical Energy Systems Analysis	83
Glynnis & Jim Kaye	Pleasanton Residents	63
Dianne Keiler	Pleasanton Resident	63
Colleen Keller	Pleasanton Resident	63
Michelle LaMarche	Pleasanton Resident	63
Gary Lau	Pleasanton Resident	60
Cindy Lawrence	Pleasanton Resident	63
Anne & John Lay	Pleasanton Residents	60
Claire & Robert Leibowitz	Pleasanton Residents	60
Mark & Laura Levitch	Pleasanton Residents	60
Richard Lewis	Pleasanton Resident	63
Larry Lipman	Pleasanton Resident	60
Edwin M. Liu, O.D. & Amy Liu Longacre, O.D.	Pleasanton Residents	63
Randall Lum	Director of Public Works, City of Pleasanton	80
Elaine & Brad Lusher	Pleasanton Residents	60
Staci & Ron Marchand	Pleasanton Residents	60
Bernard Mathaisel	Pleasanton Resident	60
Terri & Jeff Maxoutopoulis	Pleasanton Residents	63
Pat McCarthy & Family	Pleasanton Residents	63
James E. McFeely	Pleasanton Resident	63/70
Ralph & Aline Mele	Pleasanton Residents	60
Chris & Debra Mitchell	Pleasanton Residents	63
Lisa Moses-Allen	Pleasanton Resident	63
Michael A. & Evelyn Q. Murphy	Pleasanton Residents	60
David & Meenu Napolitano	Pleasanton Residents	63
Jayne Narog	Pleasanton Resident	63
Michael O'Brien, M.D. & Family	Pleasanton Residents	63
Shetoo R. Parikh	Pleasanton Resident	60
Nancy Patch	Pleasanton Resident	60
Ed Patriquin	President, Kottinger Ranch Homeowners Association	72
David & Maureen Perry	Pleasanton Residents	60

Alphabetical Index of Commenters for Table 2.5.C		
Source	**Community/Organization**	**Page**
Linda Pflughaupt	Pleasanton Resident	60
Lynn Poppe	Pleasanton Resident	60
Bill & Julie Rasnick	Pleasanton Residents	63
Patty Recupero	Pleasanton Resident	60
Theresa Regan	Pleasanton Resident	63
Dave & Lori Rhodes	Pleasanton Residents	60
Phil Richardson	Pleasanton Resident	68
Dore & Terrie Rosenblum	Pleasanton Residents	60
Lisa Sarubin	Pleasanton Resident	60
William Schadegg	Pleasanton Resident	74
Glenda & Kurt Schwem	Pleasanton Residents	63/70
Steve Shiromizu	Pleasanton Resident	60
Jean Shoemake	Pleasanton Resident	63
Andrew J. Skaff	Energy Law Group LLP (for the City of Pleasanton)	82
Roger & Fern Skowlund	Pleasanton Residents	63
Yvonne Smead	Pleasanton Resident	60
Neal Sornsen & Family	Pleasanton Residents	60
Carl Steudle	Pleasanton Resident	60
Shahin & Farrahand Kimiya Tahmassebi	Pleasanton Residents	60
Donna & Henry Taylor-Webber	Pleasanton Residents	63
Richard & Deborah Ter Keurst	Pleasanton Residents	60
Gary Ternes	Pleasanton Resident	60
Lea & Marty Toomey	Pleasanton Residents	60
Jerry & Toni Ulrich	Pleasanton Residents	60
Jim & Carol Waksdal	Pleasanton Residents	60
Stephanie Walsh	Pleasanton Resident	63
Luo Wang	Pleasanton Resident	63
L.M. Westmacott	Pleasanton Resident	60
Corey Wong	Pleasanton Resident	60

TABLE 2.5.C SCOPING WRITTEN AND TELEPHONED COMMENTS: PLEASANTON AREA

NOTE: The following is a compilation of comments received from the residents of the Ruby Hill neighborhood in Pleasanton. Because these commenters voiced similar concerns, their comments are compiled in this column, while the individual commenters are named below. An estimate of the number of commenters voicing a specific comment/concern is given in parentheses after each specific comment. Names of commenters:

- Richard & Laura Danielson
- Anju Bhatia
- Jan & Craig Hope
- Jan & Cindy Gruden
- Caroline Herb
- Debby Alberts
- Linda Pflughaupt
- Lorna & Ron Christenson
- B.S. Denhoy
- Mark & Antoinette Cunningham
- Shetoo R. Parikh
- Steve Shiromizu; Adil M. & Rohan A. Daruwala; Sona Chawla
- Dore & Terrie Rosenblum
- Elaine & Brad Lusher
- Claire & Robert Leibowitz
- John & Mary Bjorkholm
- David & Maureen Perry
- Ronald Davis
- Nancy Patch

Hotline voice messages:

- Susan Braymer
- Lisa Sarubin
- Carol Cohen
- Jerry & Toni Ulrich
- Steve Glovin
- Mary Pat Hawkins
- Staci & Ron Marchand
- Elizabeth Boswell
- Edward C. & Carolyn L. Dougery
- Lea & Marty Toomey
- Charles (Bud) Cook
- Michael Hunter
- Corey Wong
- Bruce & Elaine Blanco
- EMJ (Complete name not provided)
- Catherine Andrejak
- Neal Sornsen & Family
- Karin Bunnell
- Patty Recupero
- Lisa & Robert Chaplinsky
- Betsy Conron
- Larry Lipman
- Mel D. & Donna Borer
- Terri Carl
- Kirk & Hilda Hasserjian
- Lynn Poppe
- Yvonne Smead
- The Jay Family
- Bill Green
- Warren & Joanne Dumanski
- Michael A. & Evelyn Q. Murphy
- Gary Ternes
- Bernard Mathaisel
- Sal & Jane Brogna
- Raymond & Elaine Del Franco
- Robert & Christi Hilton
- Jim & Carol Waksdal
- Shahin & Farrahand Kimiya Tahmassebi
- Anthony J. & Joy Ann Barraco
- Steve & Jody Adams
- Anne & John Lay (?)
- Robin A. Despotes
- Gary & Carol Heil
- L. M. Westmacott
- Jonathan & Patricia Gochoco
- Pierre & Anne-Marie Guebels & Family
- Carl Steudle
- Mark & Laura Levitch
- Lynwood, LeaAnn, Morgan & Madison Champion
- Ralph & Aline Mele
- John Glenn
- Dave & Lori Rhodes
- Donna & Thomas Fristo
- Richard & Deborah Ter Keurst
- Gary Lau

TABLE 2.5.C SCOPING WRITTEN AND TELEPHONED COMMENTS: PLEASANTON AREA							
#	**C**	**Commenter**	**Comments/Items Suggested For Incorporation in EIR/EIS Scope**	**Status of Suggested Scope Item**			**Responses/Remarks**
				Already In Scope	**Incorporated Into Scope**	**Not Incorporated Into Scope**	
1	A	[above]	Oppose placing dielectric cables in or near residential areas (36)			NA	The purpose of an EIR is to analyze the potential impacts of an action and identify mitigation where appropriate; the EIR does not make recommendations about decision makers' eventual selection of a project. Therefore, there was no change in scope as a result of these comments.
	B	[above]	Danger to families and children (28) - Concerned about potential EMF effects on residents' health; concerned about safety of underground cables, including the possibility of explosion or upset due to earthquake	X			Potential health and safety impacts of the proposed project and the alternatives will be analyzed in the EIR
	C	[above]	Possible detrimental effect on housing prices/values (10)				As prescribed by CEQA, the EIR will not analyze the potential economic effects of the proposed project, except insofar as these might have physical effects or might indicate the significance of physical effects such as the preclusion of an allowed land use.
	D	[above]	This technology (buried dielectric cable) is unproven and should not be tested in residential neighborhoods (11)	X		X	In its analysis of PG&E's proposed project, the EIR team will review and report on the literature on the use of this technology in other jurisdictions.
	E	[above]	Explore other options/alternatives (unspecified) (27)	X			Other alternatives were thoroughly considered for study in the EIR by the CPUC during scoping. Please see Section 3 of this Scoping Report (Alternatives Screening Results) for a summary of the alternatives selected/not selected for study in the EIR and the reasons for those decisions.
1	F	[above]	PG&E cannot be trusted and refused to consult with us or the City of Pleasanton during their process (6)	X			No matter what occurred during PG&E's process in preparing its submittal to the CPUC, during scoping and preparation of the EIR on the proposed Tri-Valley Project, the CPUC has sought and will continue to seek the participation of ***all*** interested members of the public.
	G	[above]	Opposed to transmission lines on the Isabel Avenue extension		NA		See response to item 1A in Table 2.5.C.

TABLE 2.5.C SCOPING WRITTEN AND TELEPHONED COMMENTS: PLEASANTON AREA							
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				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
			or along Vineyard Avenue or near Ruby Hill area (73)				
	H	[above]	Opposed to transmission lines through Kottinger Ranch (18)		NA		See preceding response.
	I	[above]	Do health risk assessment; study cancer clusters (1)				A health risk assessment appropriate to the scope of this EIR will be performed; a cancer-cluster analysis will not be part of this analysis.
	J	[above]	Oppose transmission lines near schools (4)		NA		See response to item 1A in Table 2.5.C.
	K	[above]	Support the City of Pleasanton's position as expressed in Randy Lum's letter (3)	X	X	X	Review responses to the City of Pleasanton's written scoping comments in item 11 of this table.
	L	[above]	Place transmission lines in open space and non-residential areas, such as Stanley Ave. corridor (6)		X		See response to item 1E in Table 2.5.C.
	M	[above]	Support bringing additional power into Pleasanton/Tri-Valley area (3)			NA	See response to item 1A in Table 2.5.C.
	N	[above]	Install utilities underground to avoid visual impacts (9)	X			Visual/aesthetic impacts will be analyzed in the EIR and appropriate mitigation will be described to lessen or eliminate significant impacts. See also response to item 1E in Table 2.5.C.
	O	[above]	Support undergrounding dielectric cable and PG&E's proposed project (1)			NA	See response to item 1A in Table 2.5.C.
(NOTE: The following is a compilation of comments received from the residents of the Kottinger Ranch/Vintage Hills neighborhood in Pleasanton. Because these commenters voiced similar concerns, their comments are compiled in this column, while the individual commenters are named in the previous column. An estimate of the number of commenters voicing a specific comment/concern is given in parentheses after each specific comment.)							

TABLE 2.5.C SCOPING WRITTEN AND TELEPHONED COMMENTS: PLEASANTON AREA							
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				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
		- Edwin M. Liu, O.D. & Amy Liu Longacre, O.D. - James E. McFeely - Glenda Goulette & Kurt Schwem - Marla & Dan Filippi - Louis & Susan Astbury - Bill & Julie Rasnick - Mike & Jacquelyn Evans - Colleen Keller - Theresa Regan - Donna & Henry Taylor-Weber - Caryn & Will Evangelista - Chris & Bob Corey - Pat McCarthy & Family		- Amy Baker - Richard Lewis - David Bangs - Michael O'Brien, M.D., & Family - Chris & Debra Mitchell - Laura & Bing Hadley - David & Meenu Napolitano - Ron & Ester Hart - Jayne Narog - Gregory J. Albin - Glynnis & Jim Kaye - Allen House - Michelle LaMarche			- Jean Shoemake - Douglas & Donna Evans - Parris & Andrea Hawkins - Cindy Lawrence - Luo Wang - Lisa Moses-Allen - Diane Keiler - Stephanie Walsh - Terri & Jeff Maxoutopoulis - Michelle Antilla - Roger & Fern Skowlund **Hotline voice messages**: - Nick Cox
2	A	[above]	Is this project necessary? Does PG&E have an ulterior motive for proposing this project? Are they trying to monopolize the electricity industry? Are they overbuilding their system? How many people/what cities will this system serve? Is 230 kV necessary? (1)	X			According to PG&E's application and Proponent's Environmental Assessment (PEA) before the CPUC, the growth in electrical energy demand in the Tri-Valley requires implementing actions to increase the availability of electric power in this area. The role of the EIR will be to analyze the proposed project and a range of reasonable alternatives to provide information to CPUC decision makers about the potential environmental effects each of these options poses and what feasible mitigation may be available to lessen or eliminate these effects.
2	B	[above]	Concerned about the health risk to residents, particularly children, from EMF; concerned about safety in the event of an earthquake or explosion; note 1999 NIEHS recommendation against high voltage power lines near residential areas (35)	X			Health & safety and seismic impacts will be analyzed in the EIR.
	C		The foot traffic @ Hearst & Concord on a school morning is significant and would be in the immediate area where the dielectric cable would be located and construction to install it would occur. (2)	X			See response to item 1B in Table 2.5.C.
	D		What are the potential effects of tunneling through the water	X			Potential groundwater and surface water impacts

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			table? (1)				of the proposed project and its alternatives will be analyzed in the EIR.
	E		Accessibility of the dielectric cable lines/disruption to the neighbor-hood for maintenance/ repair. (2)	X			The proposed project's and its alternatives' traffic, safety and service disruption impacts during construction and maintenance of the transmission lines will be analyzed in the EIR.
	F		Construction impacts on traffic and safety of pedestrians, particularly children; community disruption (11)	X			See response to item 2E in Table 2.5.C.
	G		This (buried dielectric cable) is an unproven technology and PG&E's claims about it are unreliable (21)	X			Based on an updated technical report, the EIR will review information on the "track record" of underground dielectric cable, the technology proposed in PG&E's preferred project, to determine how well and to what extent similar technologies have been used in other jurisdictions.
	H		Try other alternatives (26)		X		See response to item 1E in Table 2.5.C.
	I		Opposed to PG&E's preferred project going through Kottinger Ranch (25)		NA	NA	See response to item 1A in Table 2.5.C.
	J		PG&E did not consult with the City of Pleasanton or affected residents; PG&E is arrogant; mistrust of PG&E (17)			X	See response to item 1F in Table 2.5.C.
2	K		Potential degrading effects on housing values; commenters and/or neighbors will be forced to move (11)			X	Under CEQA, an EIR can analyze economic effects only insofar as these would affect the physical environment or indicate the significance of a physical effect. Potential impacts on land use will be analyzed in the EIR.
	L		This controversial project will be much more costly (1)			X	While controversy may add to the cost of the proposed project, it is not the role of an EIR to analyze cost *per se*.
	M		Adverse visual impacts of overhead transmission lines (1)	X			Visual/aesthetic impacts will be analyzed in the EIR and appropriate mitigation will be described to lessen or eliminate significant impacts.
	N		Potential impacts on (buried) telecommunications or cable media? (1)	X			Potential impacts of buried cable on other nearby buried services will be analyzed in the EIR.

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	O		The association of the City of Pleasanton with the major capacity increase seems to be an artifact of the inclusion of portions of Dublin with Pleasanton in one of PG&E's Distribution Planning Areas (DPAs). This leads to the applicant's erroneous conclusion that the Vineyard Substation must have increase power. (1)			NA	PG&E's PEA indicates that a significant portion of Pleasanton's electrical demand is served through the San Ramon Substation. A slower rate of growth in Pleasanton does not necessarily mean that additional power will not be needed there or that PG&E is imposing on Pleasanton's Vineyard Substation to provide power for growth in Dublin-San Ramon.
(The following comments are from residents of Kottinger Ranch who presented more detailed comments or suggestions for alternatives, all or some of which could not easily be subsumed under those comments listed above.)							
3	A	Dr. Douglas C. Huey	Safety of the Design. PG&E proposes a new and unproven "solid dielectric" buried cable technology, which suffers from an inherent weakness in that a failure of the insulation will most certainly lead to arcing and an ensuing explosion. Dielectric insulation is subject to failure when either physically abused or when exposed to water. The dielectric material is protected from extensive and surrounding groundwater by just a thin layer of lead shielding and various polymer coats. Cable and shield could be undetectably abused when drawn through conduit and around six-foot diameter corners. A failure over its life can be readily anticipated.	X			Potential safety impacts of the installation and operation of buried dielectric cable will be analyzed in the EIR. Please also see Section 2.5.A., response to Question No. 22, for information on underground, high voltage power transmission systems, particularly solid dielectric cable.
	B		Impact on Health. NIEHS study in the early 90s concluded that the relationship between EMF exposure and the incidence of childhood leukemia is weak, but that there is no consistent explanation for the observed increase other than correlated higher exposure to EMF. These exposures are fully an order-of-magnitude less than that which would be imposed on Pleasanton. Is this risk a rational one to be accepted by the PUC?	X			Health and safety impacts will be evaluated in the EIR. The role of the EIR is to describe potential impacts which could reasonably be expected to occur with implementation of the proposed project or any of its alternatives. Whether an as-yet-to-be-determined risk is a reasonable one will be part of an eventual decision by the five CPUC commissioners in the General Proceeding.
	C		It is interesting that, with no direct cause and effect proven, the PUC has taken the position that exposure to EMF is not a problem.	NA	NA	NA	The comment is not accurate. The CPUC has examined the potential for EMF risk for ten years, including funding a several-year research and

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							education program managed by the California Department of Health Services (DHS). This will culminate in a report by DHS later this year. For more information: *www.dnai.com ~ emf/*
3	D	Dr. Douglas C. Huey (Cont'd)	PG&E Credibility. PG&E lied on their application by claiming that they had involved affected residents in their planning process, while never having done so. PG&E then selected the one option that maximally affects the residents that were shut out of the planning process.			NA	See response to item 1F in Table 2.5.C.
	E		Requests for Further Review: 1. What is the experience of other utility companies in this country in using this technology? (A dozen or so companies contacted by the Kottinger Ranch Homeowners Association thought the concept to be unproven and dangerous.)		X		As stated in the answer to Question 22 in Section 2.5.A, the CPUC tentatively plans to have a technical report on high voltage, underground transmission systems, particularly solid dielectric cable, updated.
	F		2. PG&E claimed that using buried cable would be dangerous and unreliable when North Livermore interests requested its use to minimize visual impacts in a non-residential area. Why don't these criteria apply for the use of buried cable in residential areas?	X			The EIR will assess the potential health and safety impacts of buried cable independent of claims by PG&E or other interests.
	G		3. PG&E claims that overhead routings to get power to the Vineyard Substation would harm valuable riparian habitats. Why doesn't that same concern exist for the other 30-40 miles of overhead lines being proposed on this upgrade? Please verify that that concern is applied equally over all alternative routings.				The potential impacts on riparian habitats of the entire proposed project and the selected alternatives will be evaluated in the EIR.
	H		4. Has PG&E violated state law and/or PUC policy by having discussions with some parties in this matter while refusing to have discussions with those ultimately impacted? Is there an equivalent of the Brown Act that PG&E must follow? Is there a PUC policy that requires PG&E to act in an ethical manner?	NA	NA	X	See response to item 1F in Table 2.5.C. As a private investor-owned company, PG&E is not subject to laws similar to the Brown Act for government. The CPUC's Consumer Services Division investigates allegations of utility misbehavior.

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3	I	Dr. Douglas C. Huey (Cont'd)	5. PG&E has refused to share the decision model which they use to evaluate and select projects with any reviewing body. They should be forced to divulge this model, or the conclusions reached from it should be discounted.			NA	PG&E's decision model has been provided to the EIR team. However, this model will not define or constrain the scope or content of the EIR, nor the CPUC's decision-making process.
	J		6. There was an inference that a potential route, roughly located between Pleasanton and Ruby Hill, to provide power to the Vineyard Substation was discounted, since it incorrectly showed property as parkland that would be presumably untouchable. Shouldn't this route be reconsidered?		X		Routes between Pleasanton and Ruby Hill, along with others suggested by agencies and the public during scoping are among those considered for inclusion as alternatives in the EIR. Please see Section 3 for a summary of the results of this alternatives screening.
	K		7. PG&E has stated that the routing of the buried 230 kV cable is in an established easement. Please review the details of that easement whether it is an easement for power *distribution* vs. the requested power *transmission*.	X			The EIR will determine the permits, approvals and other rights that would be necessitated by the proposed project and EIR alternatives.
4	A	Phil Richardson, Kottinger Ranch resident, Pleasanton	PG&E's Exclusionary Process. In March, 1999, PG&E met with other cities, government officials, land developers and representatives from Ruby Hill, Wente Vineyards and Kalthoff Vineyards. Pleasanton City officials were unable to attend and were later denied information from the utility. PG&E did not invite anyone from the proposed route area (Kottinger Ranch, Vintage Hills, Bernal area), then selected a route directly through this residential area. I believe this process was unfair and resulted in distorted, biased data. PG&E has failed to incorporate community values and the impact on people.	NA	NA	NA	See response to item 1F in Table 2.5.C.
4	B	Phil Richardson (cont'd)	Efficacy of PG&E's Proposed Route. Early in our research we called utility companies throughout the country to find out how common it is to route 230 kV solid dielectric underground circuit through a residential neighborhood. Consistently we were told this was not an accepted technology, especially at this high voltage. Every company told us they would avoid a residential neighborhood as a first priority.	X			See response to item 3A in Table 2.5.C.
	C		Professionals working in the utility field expressed concern about the long-term safety, potential health risks of EMF,	X			See response to item 3E.1 in Table 2.5.C.

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			potential damage to the cable by installing it in a neighborhood with many turns in the streets, and the lack of any long-term experience in the U.S. with 230 kV solid dielectric underground circuits.				
	D		Alternative Routes. The PUC should consider these additional routes and variations in its analysis: Eastern Alternative. Use PG&E's proposed 230 kV feed point and initial path overhead to the top of the hill. Transition to underground and start down the hill, but continue in an open space area between Kottinger Ranch, Grey Eagle and Ruby Hill toward Vineyard Avenue. Options at Vineyard Avenue: (a) Continue underground on Vineyard to Bernal, turn right and proceed to the substation; (b) cross Vineyard and proceed across the gravel quarry property to Stanley Blvd, and into the substation either by underground or overhead lines; (c) cross Vineyard and proceed behind the Shadow Cliff development into the substation.			X	See the response to item 1E in Table 2.5.C.
			1. Arroyo Substation 60 kV. Tap the 230 kV Tesla lines and transform to 60 kV at a new Arroyo Substation. Deliver power directly to the existing 60 kV reconductored lines, which will result in increased power delivered to the Vineyard Substation,			X	See the response to item 1E in Table 2.5.C.
			2. Arroyo Substation 115 kV. Tap the 230 kV Tesla lines and transform to 115 kV. Deliver power to Vineyard using the existing circuit reconductored to handle higher power.			X	See previous response.
			3. Arroyo Substation 115 kV. Tap the Tesla lines and transform to 115 kV. There are several routes to avoid residential neighborhoods: Use Hwy 84, or parts of Vineyard near Hwy 84, to Isabel, to Stanley and into the Vineyard substation.			X	See previous response.
			4. PG&E's 12 other routes from March, 1999. Evaluate one of these other routes as an alternative.	X			See previous response.

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5		James E. McFeely	***(Some of Mr. McFeely's comments were included in the comment summary above; what follows are his suggestions for project alternatives.)*** 1. A variety of routes through the uninhabited region between the new northern 230 kV line and the Vineyard Substation. 2. A variety of routes that would traverse the uninhabited regions bounded by Stanley Blvd., Isabel Avenue and near Vineyard Avenue.		X X		See the response to item 1E in Table 2.5.C. See previous response.
6	A	Glenda Goulette & Kurt Schwem	***(Some of these comments were included in the comment summary above; what follows are additional specific comments offered.)*** PG&E will disrupt the ecological balance in the Kottinger Ranch neighborhood.	X			The potential environmental effects of the proposed project and its alternatives will be analyzed in the EIR.
6	B	G. Goulette & K. Schwem (cont'd)	Identify alternative energy solutions.			X	"Local Generation" using natural gas turbines is one of the alternatives selected for consideration in the EIR (see Section 3). This is not "alternative energy" *per se*, but the only "non-wires" alternative feasible at this time.
	C		Identify a route that bypasses all residential areas.		X	X	Alternatives have been developed (See Section 3) which avoid residential areas to the maximum degree possible. Total avoidance is not possible.
	D		PG&E should consider using smaller wiring that has been tested and proven for safety.	X			The Aspen team includes electrical power experts who will review the technical aspects of the proposed project, the alternatives and possible mitigation measures in conducting the environmental study.

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	E		Aspen and the CPUC must demand that PG&E start working in honesty and fairness with the City of Pleasanton immediately.	NA	NA	NA	The preparation of an EIR is the sole responsibility of the CPUC and its independent consultant, Aspen Environmental Group. We will work with the City of Pleasanton and all other interested members of the public as a neutral fact finder in preparing this EIR.
	F		The CPUC and Aspen Environmental should make strong recommendations to trash this ill-advised route immediately.			NA	See response to item 1A in Table 2.5.C.
	G		If Aspen determines this (the proposed project) is the only route possible, homeowners should be paid the full fair market value of their homes plus a hefty bonus for inconvenience and allowed to move away from this Love Canal scenario.			NA	It is not the role of the EIR to determine that only one route is possible. The EIR will identify the impacts of the proposed project and the alternatives and any mitigation measures to lessen or eliminate those impacts. The CPUC's "General Proceeding" is the appropriate forum for compensation issues related to economic impact. The EIR will also identify the "environmentally superior" alternative for the CPUC's consideration in making a decision about PG&E's application.
7	A	Marla & Dan Filippi, Pleasanton	***(Most of the Filippis' comments were included in the summary comment section above; what follows are two additional, specific comments.)*** Alternative Alignment: There are open spaces down Stanley Boulevard, which is an industrial area with no housing. This is also close to Vineyard Substation and existing lines.		X		See the response to item 1E, Table 2.5.C.
	B		Get market values of homes in the proposed route so PG&E can develop a bond to pay damages to homeowners who lose property value because of this project; PG&E's project must incorporate retribution costs to impacted homeowners.			NA	See the response to item 6G in Table 2.5.C.

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8	A	Ed Patriquin, Pleasanton	Proposed Project Not a Direct Solution: Main rationale for the proposal is new housing in the Tri-Valley area; only three projects in Pleasanton; PG&E wants to serve San Ramon and West Dublin by reallocating power from North Pleasanton. If the problem is in San Ramon and Dublin, why solve it in Pleasanton?			NA	PG&E's PEA indicates that a significant portion of Pleasanton's electrical demand is served through the San Ramon Substation. Less significant growth in Pleasanton does not necessarily mean that additional power will not be needed there or that PG&E is imposing on Pleasanton's Vineyard Substation to provide power for growth in Dublin-San Ramon.
	B		Dielectric Cable Technology: Several problems: (1) PG&E plans to use a cable they have never used before; they plan to leverage the experience of other utilities (most of which are in Europe and Asia) to speed deployment of this technology; (2) cable is almost six inches in diameter and must be bent very carefully to avoid damage; streets in Kottinger Ranch are about 30 feet wide; transition from Benedict to Hearst via Smallwood Court requires two 90° turns with potential for hidden damage that could result in failure; (3) concerned about probability of failure, type of failure and result of failure; PG&E acknowledged in Pre-Hearing Conference Statement that these lines are susceptible to failure and difficult to repair; why put them in residential area where catastrophic failure will do the most damage?	X			See the response to item 3A in Table 2.5.C.
8	C	Ed Patriquin (cont'd)	Routing Practices: PG&E chose to ignore 12 alternatives through open space or commercial districts to propose the route through Kottinger and the Bernal corridor. This decision is inconsistent with industry practices *(several sources cited and quoted by commenter; see Volume 2 of this Scoping Report, available at repositories, for specific quotes.)* PG&E ignored the eastern alternative route through open space between Kottinger Ranch, Ruby Hill and Grey Eagle, claiming it is parkland; PG&E provided information on only a few of their alternatives.		X	X	These and other alternatives have been evaluated for inclusion in the EIR; please see Section 3.
	D		Community Impact: PG&E admitted to ignoring community impact, unless it resulted in the loss of a residence. This	X		X	See the responses to items 2K and 3B in Table 2.5.C.

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			route is being imposed on the residents. We did not choose to live next to a high-voltage corridor. The only decision that affected homeowners can make is to sell their homes; many have indicated they will move; a tight-knit community will be destroyed forever.				
	E		The proposed route goes through the only access to homes on Hearst, Locke, Crespi, Benedict and Smallwood; repair, maintenance, or failure east of Concord Avenue could isolate these homes; cable passes right in front of Kottinger Children's Park, along two sides of our recreation area, and in front of a community play area on Pons Court; it passes directly through the most direct route children take to Vintage Hills Elementary School. Parents driving kids to school drive directly over the cable route. What would be the impact of a catastrophic cable failure? Construction/ maintenance would play havoc with an already disastrous school traffic problem.	X			See the response to item 3A in Table 2.5.C.
8	F	Ed Patriquin (cont'd)	Alternatives: (1) Use additional low-voltage feeder cables to provide increased power to San Ramon and/or to offload the North Pleasanton load from San Ramon; feeder cables could come from the new North Dublin Substation. (2) Put a new substation next to the new load in Dublin/San Ramon. (3) Review the alternative routes PG&E discounted or ignored; seriously consider the eastern alternative and the Isabel/Stanley route supported by the City of Pleasanton. (4) Consider distributed generation.	X(1) X(2)	X(3) X(4)	X(1)	(1) Part of this suggestion (expansion of feeder lines from existing substations) is essentially the "No Project" alternative (See Section 3). See Section 3 for other discussion of alternatives. (2) This is the proposed Dublin Substation; other alternatives to this site have also been considered (see Section 3). (3) See the response to item 1E in Table 2.5.C. (4) See the Section 3.
9	A	William M. Schadegg	I oppose the running of these transmission lines through my community.			NA	Your opposition to the proposed project is noted. See the response to item 1A in Table 2.5.C.
	B		This project is too large to place in a quiet neighborhood; deep trenches in existing streets; dirt, concrete and asphalt to be hauled out; concrete, cabling, conduit, maintenance entrance boxes, etc., to be brought in. Project will produce airborne dust and dirt, create extra traffic and noise.	X			Construction impacts of the proposed project and the alternatives will be analyzed in the EIR, and mitigation measures to reduce or eliminate these impacts will be identified.

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	C		Cutting and tearing up all the primary roads in our community will scar and deface the community and expose residents to noise, environmental pollution and inconvenience.	X			See response to item 9B in Table 2.5.C.
	D		Project could expose the community to dangerous dielectric cable failures, disruptive maintenance or a complete system retrofit.	X			See the response to item 3A in Table 2.5.C.
	E		The transmission towers and transition structure will degrade views from Kottinger Ranch.	X			See response to item 1N in Table 2.5.C.
	F		Given the ongoing controversy about electromagnetic emissions, it is inappropriate to implement this technology in a family neighborhood. Cable failure could kill or maim children or adults.	X			See response to item 1B in Table 2.5.C.
	G	William M. Schadegg (cont'd)	This is an unproven technology. Grass fields in this area are dry for six months of the year. Running the cable line near our homes increases the chances of fire. These cables will generate large amounts of heat. How will this affect the temperature of the road surface?	X			Potential hazards, such as fire and heat, of the proposed project and its alternatives will be analyzed in the EIR.
	H		There is a high water table under road surfaces in the path of the proposed underground cable.	X			Impacts of the proposed project and its alternatives on or caused by groundwater and a high water table will be analyzed in the EIR.
	I		Construction and operational noise could be disruptive.	X			Construction and operational noise impacts of the proposed project and its alternatives will be analyzed in the EIR.
	J		Adults and children walk, roller blade, ride bikes, skate, play games, sit by the road and talk, and use the streets to go to the pool, tennis courts and parks. Construction impacts and fear of exposure to EMF could severely curtail these activities.	X			The EIR will analyze health and safety, and recreation and land use impacts.
	K		General Issues: (1) Issues involving families' health, safety, emotional wellbeing, financial security and fundamental values; (2) General environmental degradation; (3) PG&E communications – PG&E has not distributed one shred of information; (4) the cumulative effect of all these issues will	X		X	Health & safety, environmental and cumulative impacts will be analyzed in the EIR. PG&E's project communications are not a topic for analysis in the EIR.

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				Already In Scope	**Incorporated Into Scope**	**Not Incorporated Into Scope**	
			put an unreasonable and unjustifiable burden on those affected.				
	L		Suggested Alternative #1: Stanley Boulevard, Isabel Avenue, Highway 84; run cables underground from Vineyard Substation to the Tesla-Newark Transmission Line Corridor.		X (partial)	X	See the response to item 1E in Table 2.5.C.
	M		Alternative #2: Site the transmission cable above ground in a location that preserves views or underground to hilltop (?); transition to underground cables about 1.2 miles through open space between Pleasanton residential areas and Ruby Hill, then across quarry to Stanley Blvd. and on to Vineyard Substation. Other options for this segment: Underground east along Vineyard to Isabel, then north to Stanley, then west to substation, or underground along Vineyard Avenue to Bernal, north on Bernal to Stanley, then into Vineyard substation. (less preferred by commenter because of proximity to residential areas on Vineyard.)		X (partial)	X	See the response to item 1E in Table 2.5.C.
9	N	William M. Schadegg (cont'd)	Alternative 3: No Project.	X			CEQA requires the analysis of the No Project Alternative in every EIR.
	O		Alternative 4: Local power generation in the business park.		X		"Local generation" is an alternative to be included in the EIR; See Section 3.

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10	A	Christopher A. Hilen, attorney, LeBoeuf, Lamb, Greene & MacRae, L.L.P., representing the Kottinger Ranch Homeowners Association of Pleasanton	PG&E's application appears to be incomplete. The required Impact Assessment Summary Checklist omits an assessment of the environmental effects the project will have on human beings. The CPUC's environmental checklist form includes a section on mandatory findings of significance, which provides in part: "Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly."Can you confirm whether copies of the PEA provided to you omit (this) assessment?			NA	PG&E's PEA is only the very first step in a comprehensive EIR preparation process. Any relatively minor omissions of form in PG&E's application will in no way impede the CPUC's independent preparation of a CEQA-compliant EIR. Regardless, it bears noting that most of the impacts addressed in PG&E's PEA (as in CEQA) are "effects on human beings," e.g., air quality, noise, traffic/transportation, land use and cultural resources.
	B		Residents of Kottinger Ranch oppose the "Southern Plan, Vineyard Route" as proposed by PG&E. They are not trying to stop the Tri-Valley Project. They recognize the need for more electric capacity in the Tri-Valley Area.			NA	See the response to item 1A in Table 2.5.C.
10	C	Christopher Hilen (cont'd)	PG&E's attempt to put a high-voltage transmission line through a residential neighborhood is highly irresponsible. High-voltage transmission lines are incompatible with residential neighborhoods, particularly where there are feasible alternatives to avoid this route and minimize impacts on both the environment and the community.	X			See the response to item 1E in Table 2.5.C.
	D		CEQA requires analysis of the potential impacts of this project on the people who live along the proposed route.	X			As the commenter notes the CPUC's Notice of Preparation concluded: "The project may have environmental effects which could potentially cause substantial adverse effects on human beings, either directly or indirectly." The EIR will analyze these potential impacts.

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	E		**The CPUC should review the following feasible alternatives:** 1.Vineyard Avenue 60 kV Alternative: Build a 230/60 kV substation (the Arroyo Substation) adjacent to the Tesla-Newark transmission line corridor; reconductor portions of the existing Newark-Livermore and Vineyard-Vallecitos 60 kV lines. Some portions of the line could be undergrounded.			X	See response to item 9(O) in Table 2.5.C (above).
10	E	Christopher Hilen (cont'd)	2.Isabel to Stanley Alternatives: Isabel is being built out to become the new route 84 and Stanley is a major thoroughfare with a large quarry and other industrial uses on either side and two sets of railroad tracks and multiple sets of utility poles on the north side. This route could facilitate consolidation of other utility lines and a possible net reduction of utility poles. These routes avoid residential impacts and visual impacts could be minimized. 3. Eastern Open Space Alternative: Bring 230 kV line over the hills south of Kottinger Ranch as in the proposed project, then send the line northeast through open space between the Gray Eagle development and Ruby Hill to Vineyard Avenue. Three subalternatives as previously described by commenter Schadegg,		X X		See response to item 1E in Table 2.5.C. See previous response.
	E1		Distributed Generation		X		See the response to item 1E in Table 2.5.C.
	E2		Scaled-Down Project Based on Correct Load-Growth Projections.			X	The selection of a final project composition will be the determination of the five CPUC commissioners, based on the complete record in the proceeding.

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	F		Underground high-voltage transmission lines are inherently dangerous and incompatible with residential neighborhoods. Transmission and distribution lines do fail, and failures often include explosions. A failure of a 230 kV line could cause significant destruction. Living with the constant potential of serious explosions if a failure occurs is unacceptable in a residential neighborhood. The Commission should require PG&E to produce detailed records of incidents on its underground transmission and distribution lines, in order to determine what level of damage occurs when lines of various sizes fail.	X			See response to item 1B in Table 2.5.C.
10	G	Christopher Hilen (cont'd)	230 kV solid dielectric underground transmission lines are not an accepted technology in the United States. Only a small, 400-foot underground 230 kV circuit has been installed in a substation in Colorado. PG&E claims this technology is used extensively in Europe, yet *Électricité de France's* website states that, while dielectric cable is used at low and medium voltages, it is inappropriate for use at levels of 63,000 volts and above.	X			See the response to item 3A in Table 2.5.C.
	H		PG&E's proposal to underground high voltage lines through residential neighborhoods is inconsistent with prudent utility practice in the United States.	X			See the previous response.
	I		PG&E's load-growth estimates for the Tri-Valley Area are questionable.			X	The focus of the CEQA review is not to assess project need, but the potential environmental impacts of PG&E's proposed project. The CPUC will assess the need for the project in the General Proceeding.
	J		PG&E's proposed design is unacceptable to the local planning agency. PG&E is required to take into account community values in planning their route per Public Utilities Code Section 1002. PG&E has failed to comply with this requirement.	X		NA	The EIR will analyze the proposed project's and its alternatives' potential impacts on land use and relevant local plans and policies. The CPUC is the entity which is bound by the Public Utilities Code Section 1002, which it will consider in its General Proceeding.

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	K		The inflexibility of dielectric cable means that PG&E will not be able to keep the line in the middle of the street as it claims it will. In order to get around corners, the transmission line will have to curve widely. Streets in Kottinger Ranch are only 36 feet wide, so that the wide curve necessitated by the line's inflexibility could place it close to or even under sidewalks, recreation areas or lots along the route. As the cable is pulled through cement conduit, it could be damaged or weakened, thereby increasing the chance of failure. The alternative would be to cut the cable at each turn, then splice it, but each splice joint increases the chance of line failure, increases the cost and requires the installation of a vault under the street with a large metal cover at street level, which could scar the roadway and disrupt driving.	X			See the response to item 3A in Table 2.5.C.
10	L	Christopher Hilen (cont'd)	PG&E's proposed route through Kottinger Ranch and the Bernal corridor will be more costly to build than PG&E predicts and will therefore not be the best route even under PG&E's skewed criteria. PG&E will have to bury the line much deeper to comply with its own EMF Management Plan. The Commission should factor into PG&E's proposal the loss of tax revenue to be suffered by the City of Pleasanton and Pleasanton schools and the impact on local services due to the loss of revenue because of the reduced value of homes in the neighborhood.	X		X	The EIR will analyze impacts on local services caused by the proposed project and the alternatives. Economic impacts per se are not within the purview of an EIR, but can be considered insofar as they indicate physical impacts on the environment or indicate the significance of other impacts.
	M		A high voltage transmission line will have serious impacts on the people who live in Kottinger Ranch and the Bernal Corridor. PG&E ignored those impacts in its analysis.	X			The potential impacts of the proposed project and its alternatives on humans, including, but not limited to, construction impacts, health and safety, noise, land use, and others will be analyzed in the EIR.
	N		PG&E's route planning process was exclusionary and biased. PG&E excluded everyone from the Bernal Corridor and Kottinger Ranch from its planning process and it withheld requested information from the City of Pleasanton.			NA	See response to item 1F in Table 2.5.C.
11	A	Randall A.	The City of Pleasanton is deeply concerned that the route	X			See response to item 3A in Table 2.5.C.

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		Lum, Director of Public Works, City of Pleasanton	chosen by PG&E through a densely populated residential area and the dielectric cable technology, which has not been used in residential installation in the United States, raise environmental and safety issues which could be easily avoided.				
11	B	Randall A. Lum, Director of Public Works, City of Pleasanton	None of the alternative routes examined by PG&E go through residential areas and several are less costly than the route chosen. Open space or non-residential corridors (such as the Stanley corridor or open space around the City) or a new substation with 60 kV lines would avoid the potential pitfalls and costs of PG&E's preferred alternative. As part of the scoping process, the City urges the CPUC to look toward alternative routes that will satisfy projections of reasonably anticipated need and avoid residential areas.		X		See response to item 1E in Table 2.5.C.
	C		The City is very concerned that the notice provided for the initial scoping meetings may not be sufficient to alert those residents who are most impacted by PG&E's preferred route. To the best of our knowledge, notices have not been sent to individual residents who live on or near the route chosen and the map attached to the notice is not adequate to allow citizens to evaluate whether they would be impacted by the proposed routes.			NA	Over 1100 notices were mailed to individual recipients many of whom were property owners or residents along the proposed project route; notices were placed in two local newspapers. There may have been some shortcomings in the mailing lists assembled; and these are being corrected for use in future mailings. The turnout at the Pleasanton scoping meeting, which was around 200 participants, would seem to indicate that many, if not most, of those potentially affected by this project were aware of the meeting. The CPUC will work with the City of Pleasanton to ensure that all those citizens who wish to participate in the environmental study process are notified of the opportunities to do so. The process used to elicit public involvement will be described in the EIR.
	D		We urge the Commission to hold additional scoping meetings in the near future to allow all of those impacted by the proposal to be heard.			NA	No additional scoping meetings are scheduled at this time. With publication of this Scoping Report, including the results of alternatives screening for the EIR (see Section 3), the CPUC will continue to welcome and seek timely

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							information for a complete and accurate EIR.
12	A	Andrew J. Skaff, Energy Law Group. LLP, Oakland, representing the City of Pleasanton	The City has stated many times that alternate routes, which satisfy both PG&E's perceived need to augment its transmission capacity and avoid the obvious risks inherent in placing high voltage transmission lines in densely populated residential neighborhoods with untested technology, should be analyzed.		X		See the response to item 1E in Table 2.5.C.
	B		The Eastern Open Space Alternative should be given very serious consideration.		X		See previous response.
	C		Consultants engaged by the City believe there are numerous alternatives to PG&E's preferred route that have less impact, are more reasonable and less expensive. The City, therefore suggests these three alternatives: 1. Reinforce the key elements of the existing 60 kV transmission system to satisfy added Vineyard Substation load at a fraction of the cost of the preferred plan. 2. Serve a portion of the Vineyard Substation load from existing 115 kV transmission line sections now in the Tesla-Newark corridor by constructing a 115 kV loop to the Vineyard Substation. 3. Construct 230 kV lines to serve the Vineyard load along industrial and open lands, avoiding residential areas. This list and these alternatives are not the only reasonable alternatives that the Commission should consider.		X X X	 X X	 See the response to item 1E in Table 2.5.C. See the response to item 1E in Table 2.5.C. See previous response.
	D		The City urges the Commission to schedule additional scoping meetings to discuss and receive comments on the alternatives being proposed.			NA	Neither CEQA nor the Permit Streamlining Act envision continuing scoping to review each new round of alternatives raised during the prior scoping activities. See the response to item 1D in

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							Table 2.5.C.
13	A	G. A. Jones, Electrical Energy Systems Analysis, Walnut Creek	PG&E's proposed project establishes new Distribution Planning Areas (DPAs), a new Dublin/San Ramon DPA and a new Las Positas/North Livermore DPA. These new DPAs appear to readily accommodate the PG&E identified, approved and proposed load development areas.			NA	The DPAs described by the commenter are not those described by PG&E in its PEA. The formation of new DPAs, at this point, is speculative. The EIR must analyze the proposed project and its objectives as described by PG&E.
	B		PG&E has reconfigured the Tri-Valley area 60 kV system, during maximum peak summer conditions, as a radial, rather than network (interconnected) system. This is a direct result of having installed and overutilized the Vineyard Substation at 60 kV, and not following prudent transmission system planning concepts. It is arguable that the transfer of Vineyard Substation to the 230 kV system is more important to "fixing" the 60 kV system situation than it is to its impact on area load growth.			NA	According to PG&E's PEA, the proposed project is intended to meet area load growth and to reinforce the current 60 kV system to reliably meet current demand. The CPUC will consider the need for the project in its General Proceeding.
	C		With the establishment of new Dublin/San Ramon and Las Positas/North Livermore DPAs, the necessity for any major expansion of the Vineyard Substation is questionable.			X	As noted previously, the establishment of these DPAs is, at this time, speculative on the part of the commenter. The EIR must analyze the project as proposed. Whether mitigation might call for a realignment of DPAs on the part of PG&E is, at this time, speculative. The CPUC will consider the need for the project in its General Proceeding.
	D		The PG&E Tri-Valley 2002 Capacity Increase Project Transmission Study Report, dated September 30, 1999, referenced transmission system alternatives to the conversion of Vineyard Substation to 230 kV operation. (None of these alternatives appeared in the PG&E PEA).		X	X	The CPUC and its independent environmental consultant, Aspen Environmental, are reviewing the Transmission Study Report and have considered the alternatives described in it for inclusion in the EIR (see Section 3).

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14	E	G. A. Jones, cont.	**Suggested Alternative: Reinforcing the 60 kV Transmission System:** 1. Construct a new (Arroyo) 230/60 kV substation adjacent and connected to the Contra Costa-Newark 230 kV Line #2 south of Highway 84, in the vicinity of the intersection with Vineyard Road. 2. Connect the new substation to the existing 60 kV system to Livermore, Newark and Vineyard substations. (Would require reconductoring the 60 kV lines to Livermore and Vineyard.) 3. Operate the remaining San Ramon-Newark 60 kV line section radial to serve Sunol and Vallecitos substations. This alternative accomplishes the following: Provides two 230/60 kV transformer banks for 60 kV operation under a transformer outage condition 4. Allows the 60 kV system to operated continuously in a network configuration, maximizing service reliability. 5. Constructs no new significant transmission lines in the Vineyard Substation area, or any other area. 6. Provides a new location for the addition of a "south" 230/21 kV distribution transformer in the future. Attached transmission studies indicate that this alternative would work, even with a significant increase in the load at Parks Substation.		X	X	See the response to item 1E in Table 2.5.C

TABLE 2.6 SUMMARY OF WRITTEN COMMENTS: OVERALL PROJECT AREA CONCERNS / ISSUES

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TABLE 2.6 SCOPING MEETING WRITTEN COMMENTS: OVERALL PROJECT							
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1		John Dutra, Calif State Assembly-member, 20th District, Fremont	I urge the CPUC to give speedy approval to PG&E's proposed project because it best addresses the increased power needs of the Tri-Valley area, thereby assuring the continuation of the region's economic vitality and quality of life. Because of PG&E's consultation with the affected community interests, the proposed project minimizes transmission line and substation visibility and overall community impacts.			NA	The purpose of EIR scoping is to solicit input from the public prior to finalizing the issues/alternatives to be studied in the EIR. As a result, there was no change in scope due to this comment favoring a specific option.
2		Lynne Leach, Calif. State Assemblymember, 15th District, Walnut Creek	I strongly support PG&E's proposed Tri-Valley Capacity Increase Project to meet the area's increased demand for electricity, because without PG&E's project, the Tri-Valley area's electrical system will reach capacity by mid-2002. I believe PG&E is working with the local communities and agencies to ensure that the project is responsive to local concerns. It is in the best interest of my constituents that the CPUC approve the proposed project in a timely manner.			NA	See response to item 1 above (Table 2.6).
3		Ellen Tauscher, U.S. Congress-member, Calif. 10th District, Walnut Creek	Because electrical demand in the Tri-Valley region is expected to exceed capacity by mid-2002, upgrading the local electric power system is crucial to the future economic viability of the area. I encourage PG&E to continue to work with the CPUC and a cross-section of the community to develop an environmentally and economically balanced plan to upgrade the electric power distribution system in the Tri-Valley area.			NA	No change in scope as a result of this comment encouraging a balanced decision-making process.

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4	A	Debbie Pilas-Treadway, Associate Governmental Program Analyst, State of Calif. Native American Heritage Commission, Sacramento	The Native American Heritage Commission recommends that the CPUC adhere to the following protocol in analyzing the project-related impacts on study areas archaeological resources: 1. Contact the appropriate Information Center for a records search. The record search will determine: • Whether a part or all of the project area has been previously surveyed for cultural resources. • Whether any known cultural resources have already been recorded on or adjacent to the project area. • Whether the probability is low, moderate, or high that cultural resources are located within the project area. • Whether a survey is required to determine whether previously unrecorded cultural resources are present.	X			These standard protocols for cultural resource impact assessment will be observed in preparing this EIR.

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4	A	Debbie Pilas-Treadway (cont'd)	2. Prepare a professional report detailing the findings and recommendations of the records search and field survey: • The required report should contain site significance and mitigation analyses and be submitted immediately to the planning department. • The required site forms and final written report should be submitted to the Information Center within 3 months after work has been completed. 3. Contact the Native American Heritage Commission for: • A Sacred Lands file check. • A list of appropriate Native American contacts for consultation concerning the project site and assistance in the mitigation measures.				
	B		As the CPUC completes the EIR archaeological analysis, bear in mind that the lack of surface evidence of such resources does not preclude their existence. In addition, the CPUC, as lead agency, should include provisions for archeological resources discovered accidentally during construction. [CEQA: 15064.5 (F)].	X			See response to item 4A in Table 2.6.
5		William Lepere, Development Services, Alameda County Public Works Agency, Hayward	County roads in the Tri-Valley project area are not designed for heavy construction vehicle traffic loading. If PG&E uses county roads for access during project construction, it should overlay these roads after construction has been completed.	X			The EIR will evaluate the construction impacts of the proposed project and its alternatives on existing roadways and consider mitigation such as that proposed by this commenter as appropriate.

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6	A	Brad Olson, Environmental Specialist, East Bay Regional Park District (EBRPD), Oakland	The Bosley/Weaver Property, owned by EBRPD and containing a PG&E easement which is part of the proposed project, is adjacent to the District's Brushy Peak Preserve. EBRPD is concerned that PG&E's proposed project could affect Brushy Peak Preserve's scenic resources as well as the visual environment of Shadow Cliffs Regional Recreation Area and the proposed route of the Iron Horse Trail in the Pleasanton/Dublin area.	X			The EIR will analyze the potential visual impacts of the proposed project as well as its potential impacts on land use and the plans and policies of relevant agencies. Note also (Section 3) that an alternative will be evaluated that reduces visual impacts south of the entrance to the Brushy Peak Preserve.
	B		EBRPD is concerned that PG&E's proposed project could affect special-status species at Brushy Peak Preserve.	X			The EIR will analyze the potential environmental impacts of the proposed project and its alternatives on threatened and endangered species.
	C		PG&E's 1/2000 response to EBRPD's formal written protest to the project application contained misstatements about the visual		X		The CPUC appreciates the District's clarifications of environmental setting information and District plans.

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6	C	Brad Olson (cont'd)	environment at the Bosley/Weaver Property and the Brushy Peak Preserve which have been resolved with PG&E but which the District formally refutes again at this time for the DEIR administrative record: Existing conditions for the Bosley/ Weaver Property's visual resources: The EBRPD has no plans to construct a large parking lot on the Bosley/Weaver property adjacent to Brushy Peak Preserve, so the anticipated visual degradation to the Bosley/Weaver property's environment from this parking lot should now be disregarded. EBRPD plans to remove some of the buildings and debris from this area, resulting in enhanced visual quality at this site. The existing operations at the Vasco Road Landfill, adjacent to the Bosley/Weaver Property, do not adversely affect the visual baseline for the Bosley/Weaver Property. Therefore, the visually prominent electrical transmission lines would not be introduced into an already visually compromised environment.				

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	D	Brad Olson (cont'd)	PG&E has advised the EBRPD that alternative alignments can be proposed only where PG&E has an existing right-of-way or where the landowner is willing to shift an existing right-of-way to another location on his property. According to PG&E, the landowner must make such proposals to the CPUC which will then determine if they should be evaluated in an EIR. The EBRPD would appreciate written clarification of this process from the CPUC.			*NA*	There is no CPUC regulation or directive requiring what the District has described. As a prudent business approach, PG&E may strive to minimize additional costs or the use of eminent domain associated with new rights of way.
7		Christopher Hilen, law firm of LeBoeuf, Lamb, Greene & MacRae, San Francisco	Chapter 4 of the PEA prepared by PG&E appears to be incomplete. The required Impact Assessment Summary Checklist omits assessment of the potential environmental effects the project would have on human beings. The Initial Study for PG&E's Northeast San Jose Transmission Reinforcement Project includes this kind of assessment under Section XVI and the CPUC's Environmental Checklist Form. Please confirm whether the PEA for the Tri-Valley Capacity Increase Project omits this assessment item required under Section XVI.	X			Please see response to question #7 in Section 2.5.A of this report.
8	A	Stanley A. Erickson, Chairman, Tri-Valley Group, Sierra Club, Pleasanton	The scoping process has not been conducted satisfactorily, and we feel that another round should be done. The scoping document *(apparently the commenter is referring to the PEA)* should be revised and resubmitted for public hearing.			NA	No additional scoping meetings are scheduled at this time. With publication of this Scoping Report, including the results of alternatives screening for the EIR (see Section 3), the CPUC will continue to welcome and seek timely information for a complete and accurate EIR. PG&E's PEA was only the very first step in a comprehensive EIR preparation process. Any relatively minor omissions of form in PG&E's application will in no way impede the CPUC's independent preparation of a CEQA-compliant EIR.
	B		Alternative 4 *(in the PEA)*, relating to distributed supply and demand reduction, was		X		A "local generation" alternative has been selected for inclusion in the EIR (See Section 3).

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			given inadequate attention and would indicate a lack of interest in considering the many possibilities under this alternative.				
	C		Some of the development described as "approved" is actually an approved Specific Plan. Actual development approvals for units have not been made. An approved Specific Plan is not a guarantee of development approval. Subsequent development approvals can be withheld based on infrastructure limitations.	X			Reviewing the status of development, approved or proposed, will be part of the analysis conducted for the EIR. The CPUC will also consider the need for the proposed project in its General Proceeding, on which this point could bear. Note that due to the lead time for development of energy infrastructure, prudent assumptions are necessary.
8	D		North Livermore (12,500 units) is in the proposed stage and may also be subject to the Sierra Club's "Save Agriculture and Open Space Lands Initiative," currently in the qualification process. If this initiative passes in the November election, the proposed North Livermore development may not occur.	X			As the CEQA lead agency for this project, the CPUC must and will proceed according to the current status of information. If specific facts change relative to the circumstances of the proposed project or any of the alternatives under analysis, appropriate changes in the EIR will be considered, and/or the CPUC will take such new information under advisement in the General Proceeding.
	E	Stanley Erickson (cont'd)	Please note that the load growth described in PG&E's Local Integrated Resource Plan (LIRP, Summary in Appendix D of the PEA) is "peak" load, the demand for which is of very short duration, about 3% of the hours during the year. Base load demand is approximately half of peak load. PG&E's proposed upgrade will be sized to meet peak load, therefore, 97% of the time, the system will be far underutilized.	X			The focus of the CEQA review is not to assess project need, but the potential environmental impacts of PG&E's proposed project. The CPUC will assess the need for the project in the General Proceeding.
	F		PG&E's Customer Energy Efficiency (CEE) Program focuses on consumer measures to reduce electricity demand and is not adequate nor designed to reduce electric demand on this scale. To reduce demand from existing development, there is ample opportunity for energy-efficiency retrofits of	X		X	Consideration of existing programs that can reduce electrical demand and/or manage load will be considered under the No Project Alternative.

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			equipment, systems and lighting in commercial applications, as well as residential solar photovoltaic, passive solar heating and cooling and efficiency upgrades to air conditioning systems. These measures could be funded from the avoided costs of the transmission and distribution (T&D) upgrade.				
8	G	Stanley Erickson (cont'd)	Since new development makes up most of the load demand, comprehensive energy efficiency measures such as building siting, passive heating and cooling, energy-efficient building materials, on-site generation (including renewables), efficient HVAC, efficient central plant equipment and energy efficient lighting for new construction should be evaluated as part of Demand-Side Management strategies for both commercial and residential development.	X			See the previous response.
	H		In general, PG&E's load-growth projections are questionable based on the fact that previous projections have resulted in our current over-capacity problem now.	X			See response to item 8E in Table 2.6.. It is unclear to what "over-capacity" the commenter refers. The California Energy Commission reports that electric generation capacity is at risk of being inadequate, as has been reported in the press over the past several months.
	I		Generation needs and forecasts are not adequately addressed. Upgrading the T&D system will be of no benefit if there are generation shortages.	X			Electricity generation planning is under the purview of the California Energy Commission. Conversely, adequate generation will be of no benefit, if T&D infrastructure is insufficient.
	J		Where will electric service be provided from while the substation is being modified and upgraded? What will be the impact to service?	X			These questions will be addressed by the EIR in the analysis of construction impacts of the proposed project and its alternatives.

TABLE 2.6 SCOPING MEETING WRITTEN COMMENTS: OVERALL PROJECT							
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	K		Where else has the horizontal dry boring under a creek been performed successfully without undue impact to the riparian environment? Were US Fish & Wildlife Service permits required at these other locations? This operation would appear to be very disruptive to the riparian environment.	X			The potential impacts on riparian environments of both the construction and operation of the proposed project and the alternatives will be analyzed in the EIR. Any required permits and approvals will be identified in the EIR.
8	L	Stanley Erickson (cont'd)	Issues regarding underground trenching through Pleasanton: • Where else has this type of underground conductor been used at this voltage in a residential neighborhood setting? Please cite locations, years in operation and problems encountered.	X			Potential safety impacts of the installation and operation of buried dielectric cable will be analyzed in the EIR. Please see also Section 2.5.A, response to Question No. 22, for information on underground, high voltage power transmission systems, particularly solid dielectric cable.
			• What are the risks associated with the underground conductor and mitigation measures to minimize risk? (Issues include earthquake damage, earth-shifting damage, water intrusion, stress due to road loading, accidental cutting or digging through conductor, possible causes and effects from ground fault, etc.)	X			See preceding response.
			▪ Potential effects of EMF exposure	X			See response to the first part of this comment, above.
			▪ How much does the temperature rise from duct bank and how far out does it radiate?	X			Heat radiance from the duct bank varies depending on soil type, depth of burial, and current flow. If heat is considered to be hazardous, it will be addressed in the EIR.
			▪ Describe neighborhood impacts due to construction: noise, street closures, service interruption, etc.	X			Construction impacts of the proposed project and selected alternatives will be analyzed in the EIR.
			▪ Evaluate the possibility that the installation of the underground cable will negatively affect property values.			X	As prescribed by CEQA, the EIR will not analyze the potential economic impacts of the proposed project and its alternatives, except insofar as these might have physical effects or might indicate the significance of physical effects, such as preclusion of an allowed land use.

TABLE 2.6 SCOPING MEETING WRITTEN COMMENTS: OVERALL PROJECT							
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8	M	Stanley Erickson (cont'd)	Please provide details of cost estimates.			X	Because the primary purpose of an EIR is to analyze potential impacts to the environment, cost is relevant only insofar as it relates to determining the feasibility of a possible action. This is relevant in determining a "range of reasonable alternatives," as required by CEQA. Alternatives can "impede to some degree the attainment of the project objectives, or (be) more costly" (CEQA Guidelines, Sec. 15126 (d)(1)), however alternatives must be feasible, that is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors." (CEQA Guidelines, Sec. 15364). The CPUC will consider cost in its General Proceeding.
	N		PEA, Table 3-3: Proposed project is listed as the least potential impact to special status wildlife, yet the Silverspot Butterfly have been identified near the proposed route. The route of the proposed transmission line from Sunol to Pleasanton has recently been proposed by the USFWS as critical habitat for the threatended Alameda Whipsnake under the Endangered Species Act. *(Commenter provides additional comments on entries in Table 3-3 of the PEA on potential visual and environmental impacts of the PEA's Alternatives 2 and 3, and requesting details and methodology for PG&E's estimated project costs).*	X			The EIR will present an *independent* analysis of the potential impacts of the project and the alternatives on special status species and habitats. The PEA's cited assessments represent only the judgment of the project proponent, not the judgment of the CPUC or its environmental consultant.

TABLE 2.6 SCOPING MEETING WRITTEN COMMENTS: OVERALL PROJECT							
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8	O	Stanley Erickson (cont'd)	Alternative 4: – <u>Distributed Resources and Demand-Side Management</u> ▪ "Alternative 4 could meet the needs of the project, however, until the ISO issues an RFP for DR and contracts become more effective, PG&E cannot determine the effectiveness of Alternative 4." (PEA) ▪ This is too important an alternative to not fully evaluate ▪ No cost estimates were provided for alternative 4. The PEA states that DR could cause an increase in air emissions. However, distributed generation could displace new generation capacity from large, centrally located plants. Small gas turbines typically used for peaking and DR typically have lower emissions than large, centrally located plants.	X			As noted in Section 3, the CPUC is including a local generation alternative in the EIR. See the response to item 8M regarding cost/estimates. While the commenter's assessment of air emissions is apt, the PEA refers to "typical" impacts from a gas turbine which could increase *local* air emissions. The EIR will evaluate the potential environmental impacts, including the potential air impacts, of the proposed project and the alternatives defined in the EIR independently of the analysis provided in the PEA.
	P		<u>Appendix D – Local Integrated Resource Planning (LIRP) Component</u>: This report is a summary; please provide copy of complete analysis. Describe how costs and benefits were evaluated. Demand Side Management (DSM) measures and DG devices should be more complete and include additional strategies and measures.	X			See response to item 8F in Table 2.6..
	Q		Another alternative not fully explored is the opportunity to expand and utilize the Wind Resource Area of the Altamont Hills.			X	See response to item 8I in Table 2.6.
8	R	Stanley Erickson	The fact that the proposed upgrade is sized				As noted in Section 3, a "local" generation alternative is

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		(cont'd)	for peak load, which is only 298 hours per year, or 3% of the total, is a good argument for "peaking" generation strategies.		X		being included in the EIR.
	S		An integrated, comprehensive study should be performed to evaluate the synergistic benefits of distributed generation, demand-side management, on-site renewables, wind resources, new construction programs, voluntary customer curtailment, as well as other strategies.	X		X	The No Project Alternative will consider existing programs which can reduce and/or change electricity demand and/or consumption in the project area. This will not be a comprehensive study, however, which would be beyond the scope of an EIR.
	T		Consultants used by PG&E seem primarily experienced in large T&D and pricing research. Additional consultants with extensive distributed generation, demand-side management and similar experience should be used.			NA	The CPUC is responsible for preparing the EIR on this project. The CPUC is using an independent environmental consultant team with the requisite expertise to identify and screen potential alternatives, then analyze them as required by CEQA.
	U		Appendix F – Electro-Magnetic Fields: States that the CPUC and CDHS have *not* concluded that exposure to magnetic fields is a potential health hazard, and that the potential for health effects from exposure to EMF is speculative. This report does not conclude that there are no health effects from EMF, either. There are many other reports and research that support a concern for health effects from EMF. Even if all the research is conflicting and inconclusive, there is more than ample reasons for concern and caution.	X			The potential health effects from EMF will be evaluated in the EIR based on existing information.

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				Already In Scope	**Incorporated Into Scope**	**Not Incorporated Into Scope**	
8	V	Stanley Erickson (cont'd)	The underground duct bank should not be installed in a residential neighborhood when significant and credible evidence exists that health effects on humans could occur.			NA	The underground dielectric cable (duct bank) is part of the proponent's (PG&E's) proposed project. It is not the role of the EIR or EIR preparer to recommend for or against approval of the proposed project or any alternative. That role is to provide unbiased information to decision makers and the public about the potential environmental effects, including potential effects on humans, of the proposed project and its alternatives. Decision makers will weigh this information in reaching their decision about whether to approve a project and under what conditions.
9	A	Robert W. Floerke, Regional Mgr., Central Coast Region, Calif. Dept. of Fish & Game (DFG), Yountville	*The DFG's written submission sets forth the recommended protocol and requirements for investigating and analyzing potential impacts of the proposed project and alternatives on wildlife. Some of these include:* The Draft EIR should contain a complete description and map of the vegetation, habitats and creeks including acreages potentially affected by the proposed project or one or more alternative.	X			The CPUC welcomes the CDFG's guidance and looks forward to consulting with the Department on this EIR.
	B		Impacts to habitats and mitigation measures necessary to offset those impacts should be identified and discussed. DFG recommends impacts be mitigated by avoidance, minimization of impacts, and acquisition and preservation as open space of at least an equal area and quality as that lost.	X			

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				Already In Scope	Incorporated Into Scope	Not Incorporated Into Scope	
	C	Robert W. Floerke, Regional Mgr., Central Coast Region, Calif. Dept. of Fish & Game (DFG), Yountville	Include an adequate description of endangered species mitigation measures to enable the Department, as a responsible agency for this EIR, to comply with CEQA requirements regarding the issuance of incidental 2081 take permits for State-listed, threatened and endangered species.	X			
	D		The CPUC will need to carry out close consultation with the DFG and U.S. Fish and Wildlife Services to ensure compliance with both the State and Federal Endangered Species Acts, particularly with respect to the San Joaquin kit fox which uses the project area as its primary habitat.	X			
	E		Surveys and mitigation for impacts to the California tiger salamander and burrowing owls should be consistent with established Department guidelines and mitigation requirements.	X			
	F		When conducting surveys for rare, threatened or endangered species, wildlife listed as species of special concern, federal candidate species, and plants listed by the Calif. Native Plant Society (CNPS) should be included. Consult the Department's California Natural Diversity Database (CNDDB) for a list of species found in the study area.	X			
	G		Surveys for sensitive species, particularly plants, should be conducted at proper time of year to locate them.	X			The CPUC will consult with the CDFG and USFWS to address seasonal survey constraints given the CPUC's schedule for this proceeding. Subject to this constraint, the CPUC will conduct surveys of sensitive species in season for this EIR.

TABLE 2.6 SCOPING MEETING WRITTEN COMMENTS: OVERALL PROJECT							
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	H	Robert W. Floerke, Calif. Dept. of Fish & Game (DFG) (cont.)	The Department's policy is that a project should cause no net loss of either wetland acreage or wetland habitat value. Mitigation for lost wetlands must include the creation of new wetlands on at least a 1:1 ratio.	X	X		
10	A	Garrett Smith, Principal, COGENTECH, Portland, OR	PG&E's proposed project is not the best option technically, financially, socially or environmentally. The best option for solving the Tri-Valley's future energy availability problem is Distributed Generation, an approach which emphasizes decentralized, intermediate (5 to 50MW) power plants at or near load centers that actually reduce peaking demands and, as a result, provide reliable long-term power more cost-efficiently than conventional systems.			NA	See response to items 1 and 8B in Table 2..6.
	B		The CPUC and the ISO should support the proposals from private industry on the use of Distributed Generation for meeting the Tri-Valley area's long-term power needs which have already been submitted to the CPUC.			NA	See response to item 1 in Table 2.6.

3. RESULTS OF ALTERNATIVES SCREENING

3.1 ALTERNATIVES EVALUATION PROCESS

CEQA Requirements for Alternatives. One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the impacts of a proposed project. In addition to mandating consideration of the No Project Alternative, CEQA Guidelines [Section 15126(d)] emphasize the selection of a reasonable range of technically feasible alternatives and adequate assessment of these alternatives to allow for a comparative analysis for consideration by decision makers.

CEQA requires consideration of a range of alternatives to the project or project location that: (1) could feasibly attain most of the basic project objectives; and (2) would avoid or substantially lessen any of the significant impacts of the proposed project. An alternative cannot be eliminated simply because it is more costly or could impede the attainment of all project objectives to some degree. However, CEQA Guidelines declare that an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote or speculative.

This screening analysis does not focus on relative economic factors of the alternatives (as long as they are feasible) since the CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may impede to some degree the attainment of project objectives or would be more costly.

Alternatives Screening Methodology. Alternatives to the proposed project have been selected based on the input from the public and local jurisdictions during the EIR scoping process. The alternatives screening process consisted of three steps:

Step 1: Define the proposed project and the alternatives to allow comparative evaluation.

Step 2: Evaluate each alternative using the following criteria:
- Potential for reduction of significant adverse impacts of the proposed project
- Technical and regulatory feasibility
- Consistency with PG&E Co.'s basic objectives, as well as public policy objectives.

Step 3: Determine suitability of the proposed alternative for analysis in the EIR. If the alternative is unsuitable, eliminate it from further consideration.

Identification of Significant Environmental Effects of the Proposed Project. If an alternative clearly does not provide any environmental advantages as compared to the proposed project, it is eliminated from further consideration. At the screening stage, it is not possible to evaluate potential impacts of the alternatives or the proposed project with absolute certainty. However, it is possible to identify elements of an alternative that are likely to be the sources of impact and to relate them to general conditions of the subject area. In this alternatives analysis, a preliminary assessment of potential significant effects of the proposed project was completed, resulting in identification of the following impacts:

- Visual impacts in scenic and recreation areas, and from properties adjacent to the proposed facilities
- Creation of new utility corridors in previously undisturbed areas (especially in North Livermore and Phase 2 north of I-580)
- Impacts to biological resources, including threatened and endangered species along the transmission line route (especially the Phase 2 corridor)

- Construction impacts and operational disturbance to adjacent property owners, especially in smaller residential streets.

3.2 PROJECT ALTERNATIVES TO BE ANALYZED IN THE EIR

Table 3-1 summarizes the alternatives that will be analyzed in the Draft EIR. These alternatives are illustrated on Map 1 at the end of this section. The Draft EIR will include a more detailed description of each of these alternatives, as well as more detailed maps.

The alternatives shown in Table 3-1 will continue to be evaluated during EIR preparation. Reconsideration may be given to their environmental advantages during that process.

3.3 ALTERNATIVES ELIMINATED FROM EIR CONSIDERATION BASED ON SCREENING ANALYSIS

Table 3-2 summarizes the alternatives that were suggested by various parties through scoping or developed by the EIR team, that have been eliminated from EIR consideration. A brief explanation of the reason for elimination is also presented in this table. The EIR will include more detailed explanations of reasons for elimination of these alternatives.

Table 3-1. Alternatives to be Evaluated in EIR			
Map Code	**Alternative Title**	**Description**	**Potential Environmental Advantages**
Pleasanton Area [1]			
S1	Vineyard-Isabel-Stanley	The Contra Costa-Newark line would be tapped in the Tesla-Newark Corridor just southwest of Sycamore Grove Park. The transmission line would be installed overhead for about one mile (roughly following PG&E's existing 60kV line) to the corner of Vineyard Avenue and Wetmore Rd., then underground along Vineyard Avenue to Isabel Avenue. It would be installed overhead along the west side of Isabel (about 50 feet west of the roadway) to Stanley Blvd., then turn west and be installed overhead along north side of Stanley. It would cross Stanley Boulevard into Vineyard Substation, just before Bernal Avenue.	Reduces impacts in smaller residential streets and utilizes existing transportation and utility corridors. Eliminates new corridor in hills south of Pleasanton.
S2	Vineyard Avenue	This is the route that the CPUC approved in 1988 in response to PG&E's 1986 proposal ("Vineyard 230kV Transmission Line"). It would tap the Contra Costa-Newark line southwest of Sycamore Grove Park (as in S1). It would be installed as an overhead 230kV line to the corner of Vineyard Avenue and Wetmore Rd., then underground along Vineyard to Bernal; north on Bernal (still underground), and into the Vineyard Substation.	Reduces impacts in smaller residential streets and utilizes existing transportation and utility corridors. Eliminates new corridor in hills south of Pleasanton.
S3	Vineyard South	This alternative is very similar to the route proposed by PG&E in its 1986 PEA/Application. It would be about 5.5 miles long, with about 4.5 miles underground. It would start at a tap of the Contra Costa-Newark line (in the Tesla-Newark corridor) about 1 mile southeast of the southern corner of the Ruby Hill development, then to about 0.5 miles from Contra Costa-Newark in northwesterly direction to Hwy 84, cross Hwy 84 and follow near the Ruby Hill/Foley property line for 2.5 miles to Vineyard Avenue. The line would be installed underground except for the first mile off the Tesla-Newark corridor.	Reduces impacts in smaller residential streets and utilizes Vineyard Avenue (an existing transportation and utility corridor). Utilizes open space and follows property line to minimize land use and construction disruption.
S4	Eastern Open Space	This alternative is the same as the proposed route for the first approximately 3 miles (north) off the Tesla-Newark corridor. At the overhead/underground transition, the route would turn east through open space, east of existing low-density residences and west of the Ruby Hill development, to Vineyard Avenue.	Avoids most dense residential areas and utilizes Vineyard Avenue (an existing transportation and utility corridor). Utilizes open space to minimize land use and construction disruption
LG	Local Generation	Construction of an under-50 MW natural gas turbine power plant in the City of Pleasanton, near the Vineyard Substation (likely just north of Stanley Boulevard)**.**	Delay or elimination of construction of 230kV transmission lines and Vineyard Substation upgrade. Requires EIR evaluation of feasibility and anticipated timing of developer applications. The EIR will also evaluate how long this type of small power facility could defer the need for the Vineyard Substation upgrade, and what transmission line upgrades would be required.

1 Note that all Pleasanton Area alternatives (including the proposed project) would result in the potential for removal of the existing 60kV overhead line along Vineyard Avenue and through the residential areas south of Shadow Cliffs Regional Park.

Table 3-1. Alternatives to be Evaluated in EIR			
Map Code	**Alternative Title**	**Description**	**Potential Environmental Advantages**
Dublin Area			
D1	South Dublin	The Dublin Substation would be fed from the south (through the Vineyard Substation). The 5-acre substation would be located on commercial land north of I-580 and west of Fallon Road, in the southern portion of the Dublin Ranch development. The transmission line route from Vineyard to the Dublin Substation would follow the north-south route of PG&E's PEA Alternative 2, through the gravel quarries between Stanley Boulevard and I-580.	This alternative would eliminate about 5 miles of the proposed east-west route between North Livermore Road and PG&E's proposed Dublin Substation where visual and biological impacts would be potentially severe.
D2	Dublin-San Ramon	The Dublin Substation (in PG&E's proposed location) would be fed from the west (through PG&E's existing San Ramon Substation). The approximately 4.7 mile 230kV line from Dublin to San Ramon would follow PG&E's vacant ROW. The westernmost, approximately one mile would be installed underground (from the ridgeline into PG&E's existing San Ramon Substation) to eliminate visual impacts in San Ramon. In order to increase power into the San Ramon substation, the San Ramon-Pittsburg line (a single circuit 230kV line) would need to be reconductored along its entire length (approximately 20 miles).	This alternative would eliminate about 5 miles of the proposed east-west route between North Livermore Road and the Dublin Substation where visual and biological impacts would be potentially severe.
North Livermore Area			
P1	Underground North Livermore Avenue	Same as proposed project except that the one mile section of 230kV transmission line along North Livermore Road would be underground.	Eliminates visual impact of proposed one-mile north-south 230kV line.
P2	Underground Manning Rd. and N. Livermore Avenue	Same as proposed project except that 3.8 miles of 230kV line in North Livermore would be underground (one mile along North Livermore Road and 2.8 miles in Manning Road corridor).	Eliminates visual impact of 3.8 miles of proposed aboveground 230kV line in north end of valley.
L1	Raymond Road	The tap to the Contra Costa-Newark line would be at the northeast corner of Ames Street and Raymond Road, and the line would run about 1.2 miles west along Raymond Road, entirely underground to prevent impacts to the FCC monitoring station. The substation would be located near the corner of Raymond Road and Lorraine Road.	This 1.2-mile route would eliminate 3 miles of highly visible, overhead 230kV line in the North Livermore area. The EIR will evaluate the potential hydrologic impacts on the *Palmate-bracted bird's-beak*, an endangered plant in the area.
L2	Hartman Road	The 230kV transmission line route would be the same as for S1 above, but rather than turning west on Stanley Boulevard, the line would continue north for an additional 1.7 miles along the Highway 84 corridor to the I-580 junction. The line would be installed underground for about 1 mile immediately south of I-580 due to proximity to the Livermore Municipal Airport. It would continue underground approximately 1 to 1.3 miles north of 580 to a substation site just south of Las Positas College, in an industrial area within the City of Livermore.	This alternative would eliminate over 3 miles of highly visible, overhead line in North Livermore, by feeding the North Livermore Substation from the south.
Tesla Connection Alternatives (Phase 2)			

Table 3-1. Alternatives to be Evaluated in EIR			
Map Code	**Alternative Title**	**Description**	**Potential Environmental Advantages**
T1	Tiger Creek	This alternative to constructing PG&E's Phase 2 to Tesla Substation would require use of PG&E's "Tiger Creek" line, a set of towers (constructed for a 230 kV line) that are currently vacant along a portion of the route between the Tesla and Newark Substations. The line would need to be reconductored for both circuits along the entire length between the tap point (Vineyard Substation feed) and the Tesla Substation (up to 16 miles). This alternative would also require that an existing single-circuit 115kV line that serves Lawrence Livermore National Laboratory be relocated to another underutilized PG&E corridor: the Stanislaus corridor. Nearly all of the alternatives above would require use of the Tiger Creek Alternative, because PG&E's proposed Phase 2 route would only make sense if the North Livermore and Dublin Substations were connected to each other.	Utilizes an existing transmission corridor (Tesla-Newark) rather than creating a new corridor north of the I-580. Reconductoring would reduce construction impacts and still provide connection for the Tri-Valley area to Tesla Substation.
BP	Brushy Peak	This 1.5 mile alternative would replace 1.1 miles of the Phase 2 route south of the Brushy Peak Preserve.	Reduces visual impact at road entrance south of Brushy Peak Preserve.
No Project Alternative			
	No Project	The EIR will include a definition of the actions that PG&E would most likely be required to take if the proposed project (or an alternative) is not approved. This will include actions that PG&E can pursue without, or with limited, CPUC approval (e.g., reconductoring of existing lines).	[not applicable: required by CEQA]

Table 3-2. Alternatives Eliminated from EIR Consideration		
Alternative Title	**Description**	**Rationale for Elimination**
Pleasanton Area		
West from Water Tank off Proposed route	Proposed route to water tank (or just south of it), then west/northwest through open space along ridge to Bernal Ave. (about 1.8 miles), then along Bernal into Vineyard substation. About 6.5 miles long.	Eliminates Kottinger Ranch impacts but would affect 0.5 miles more on Bernal Avenue (residential, but a larger street). Overall, no environmental advantage over proposed route.
60kV Upgrade	Construct new 230/60kV substation ("Arroyo Substation") at Tesla-Newark corridor.	These alternatives would provide increased power for only a few years, after which additional system upgrades would be required. These alternatives would eliminate a significant advantage of the proposed project: removal of the existing 60kV line through residential areas and south of Shadow Cliffs Regional Park. The size and visual impact of the bundled 60kV conductors or larger 115kV towers would be significantly greater than the existing 60kV line.
115kV Upgrade	Construct new 230/115kV substation ("Arroyo Substation") at Tesla-Newark corridor.	
Routes through Gravel Preserve area	Potential north/south routes for 60, 115, or 230kV lines from Vineyard Avenue to Stanley Boulevard west of Isabel Avenue and east of Shadow Cliffs Regional Park.	Mining operations cause safety concerns for additional lines; cost would be substantially higher due to required payment for mineral resources that could not be mined; greater visual impacts from Shadow Cliffs Regional Park.
Dublin-San Ramon routes	These alternatives would feed the Vineyard Substation from the existing San Ramon Substation or the proposed Dublin Substation (see PG&E's PEA Alternatives 2 and 3, below).	Shifts impacts from Pleasanton to San Ramon and Dublin; no overall reduction of impact.
Low Voltage Feeders	Serve growth in Pleasanton area via additional 21kV distribution lines from the existing San Ramon Substation or from new Dublin Substation.	PG&E has installed additional distribution lines over the past few years to serve Pleasanton growth. With the approved development in San Ramon and Dublin, the San Ramon and Dublin Substations will need to utilize their capacity to serve those areas, requiring the Vineyard Substation to serve Pleasanton from a separate feed.
Dublin Area		
Southern Dublin Substation 1	Substation location just north of planned developed area on Dublin Ranch property (PG&E's DS3).	Site does not eliminate environmental impacts of proposed project: would require more miles of transmission line and substation location in more visible area.
Southern Dublin Substation 2	Substation location just south of existing residences and west of future Fallon Road extension (PG&E's DS4).	Site is located in an area planned for residential development under City of Dublin and Dublin Ranch plans.
North Livermore Area		
Manning Road Substation	Substation site at the corner of Manning Road and North Livermore Avenue (PG&E's NLS1).	Substation location in highly visible site outside of developed areas. Northerly location would require all distribution lines to go down North Livermore Avenue to south.
Dagnino Road Substation	Substation site at the northeast corner of Dagnino Road and May School Road.	Connection to the Contra Costa-Newark line would cross hills within the control area of the FCC Monitoring Station. Substation would be located farthest from future development in North Livermore.

Table 3-2. Alternatives Eliminated from EIR Consideration		
Alternative Title	**Description**	**Rationale for Elimination**
Hartford Road Route	Underground transmission line starting at Contra Costa- Newark following east-west path of Hartford Road along existing small asphalt road (bikeway) and gravel road.	Underground line would pass through the center of the endangered bird's beak area, which is hydrologically sensitive. It would also follow a marked bicycle trail, the use of which would be disrupted during construction.
Las Colinas Route	From PG&E's existing Las Positas Substation, transmission line would go west (underground due to 580 scenic corridor) to Las Positas Road, north in Las Colinas Road across 580; 1 mile north along future roadway.	Sensitive land uses (resource management) surrounding this part of North Livermore plan area; roadway network many years in future so underground route north of 580 cannot be defined.
Local Generation	Construction of a small generation plant in the North Livermore area.	No such facilities have been proposed to our knowledge. Without imminent application to approving authorities, the concept of local generation is not considered feasible. [Note that local generation will be evaluated in the Pleasanton area where an application is being prepared.]
Highland Road	Move the proposed N. Livermore Substation to the site located west of Highland Rd. across from US Sprint's property; put the overhead transmission lines underground.	This location south of I-580 and about a mile east of N. Livermore Avenue is not well suited to serving the growth north of the I-580, which is developing from west to east (starting west of N. Livermore Avenue).
Dalton/Ames Roads	The N. Livermore substation could be located at the Contra Costa-Newark line near the existing City of Livermore Water Storage Tank in the area of Dalton and Ames Roads.	This alternative is very similar to the Raymond Road Alternative (see Table 3-1). Raymond Road, because it is an existing disturbed crossing of the bird's beak habitat area, is considered to provide a better access to development to the west.
Phase 2 Alternatives		
Stanislaus Corridor	Install 230kV conductors on vacant Tiger Creek towers in Tesla Newark Corridor from Vineyard tap to Tesla/Mocho Junction, then construct new 230kV towers and line in existing Stanislaus Corridor east of Tesla/Mocho Junction.	While this alternative would eliminate the creation of a new corridor as required by PG&E's proposed Phase 2, it would have more visual and construction impact than the Tiger Creek Alternative (see Table 1) which would make more use of the existing Tesla-Newark Corridor for the new 230kV line.
Wind Power	Expand the wind resource area in the Altamont Hills.	Still need transmission lines to carry power to customer load, so this would not eliminate need for project. Question regarding amount of additional power which could feasibly be generated by the windfarm, since no such expansion planned or proposed.
Reconductor Contra Costa-Newark 230kV	Reconductoring the line between Contra Costa and Newark would increase its ability to serve the Tri-Valley area and potentially eliminate Phase 2.	Several alternatives that will be analyzed in the EIR (described in Table 3-1) change the electrical configuration of the Dublin and North Livermore Substation.
Reroutes Around Landfill	Reroutes in the area of the Vasco Road Landfill could avoid potential hazards.	The potential impacts identified in the comment letter will be evaluated in the hazards and public services sections of the EIR. If impacts are identified, mitigation measures (including reroutes, if appropriate) will be recommended in the EIR.
PG&E's PEA Alternatives		
PG&E's Alternative 1	Proposed project (including Phase 2) with addition of re-conductored Tiger-Creek line feeding Vineyard substation.	Alternative does not eliminate any impacts of the proposed project; no environmental benefit.

Table 3-2. Alternatives Eliminated from EIR Consideration

Alternative Title	Description	Rationale for Elimination
PG&E's Alternative 2	Feed Vineyard Substation from proposed Dublin Substation with line through Dublin Ranch and Pleasanton gravel area.	Construction and operational impacts through Dublin Ranch to serve Vineyard Substation; more efficient alternatives to serve Vineyard exist (see Table 3-1)
PG&E's Alternative 3	Add one 230kV circuit along Iron Horse Trail, between the San Ramon and Vineyard Substations, and also one circuit along the Isabel-Stanley Alternative.	Potentially greater impact than proposed project: impacts to recreation along Iron Horse Trail, in addition to a new circuit on Isabel and Stanley. Other alternatives reduce/avoid environmental impacts of the proposed project with less additional impacts.

Insert Map 1 here: area map showing all alternatives