This section presents responses to comments received on the Draft EIR. Table H-1 lists all comments received, and shows the comment set identification number for each letter. This table also lists speakers at the Public Participation Hearings held in February 2001.

| Commenter   | Comment Set |
|---|-------------|
| Letters from Public Agencies                                  |             |
| City of Livermore   | А           |
| East Bay Recreation and Parks Department                      | В           |
| California Independent System Operator                        | С           |
| Alameda County Water Department                               | D           |
| Livermore School District                                     | E           |
| Alameda County  | F           |
| Livermore Area Recreation & Park District                     | G           |
| South Livermore Valley Agricultural Land Trust                | Н           |
| Dublin San Ramon Services District                            | I           |
| City of Dublin  | J           |
| Alameda County Flood Control and Water Conservation District  | К           |
| Pleasanton Unified School District                            | L           |
| California Department of Transportation                       | М           |
| City of San Ramon   | Ν           |
| California Department of Parks and Recreation                 | 0           |
| City of Pleasanton and Kottinger Ranch Homeowners Association | Р           |
| Letters from Private Parties                                  |             |
| Sally Scholl  | 1           |
| George Grenley  | 2           |
| David Reeve   | 3           |
| Howard Mohr   | 4           |
| David Reeve   | 5           |
| Phyllis G. Farrell  | 6           |
| John D. Farrell   | 7           |
| Matthew Perreault   | 8           |
| Sal Sanchez   | 9           |
| Matthew Cordes  | 10          |
| Fred La Monica  | 11          |
| Bill Rueff  | 12          |
| South San Ramon Neighborhood Association, Donna L. Dickey     | 13          |
| John Collins  | 14          |
| Tim Ryan  | 15          |
| James E. McFeely  | 16          |
| Leslie Pickett  | 17          |
| Rosemary Newman   | 18          |
| Nancy C. Schlachte  | 19          |
| Charles Neuenschwander  | 20          |
| Chris and Indie Feduniw                                       | 21          |
| Carla Keller  | 22          |
| Linda Pflughaupt  | 23          |

 Table H-1
 Commenters and Comment Set Numbers

| Commenter   | Comment Set |
|---|-------------|
| Michael Prokosch  | 24          |
| James Tanton  | 25          |
| Steven Bradley  | 26          |
| Tom and Vickie Grammatica   | 27          |
| Nancy Byron   | 28          |
| Carolyn Newton  | 29          |
| Greg and Christine Tuell  | 30          |
| Ralph Moir  | 31          |
| Connie Malone   | 32          |
| Wolfgang Tertel   | 33          |
| Robert F. Sterns  | 34          |
| Jeff Roy  | 35          |
| Deanna Aronoff  | 36          |
| The Family of James and Terrisa Truttman  | 37          |
| Jerry Lau   | 38          |
| Patrick and Dianne Duffy  | 39          |
| Nancy Storch  | 40          |
| Chuck and Judy Barnett  | 41          |
| Betsy Wilson  | 42          |
| Glenn Rittenhouse   | 43          |
| Colleen Nespor  | 44          |
| Randall Frost   | 45          |
| Linda Pflughaupt  | 46          |
| Greg Albin  | 47          |
| Cecil Beebe   | 48          |
| Wente Vineyards, Philip R. Wente  | 49          |
| Rui Zhang and Family  | 50          |
| Mr. P. Hawkins  | 51          |
| Lois Lutz   | 52          |
| Bill Bergmann   | 53          |
| Ford and Mary Roberts   | 54          |
| Kenneth T. and Jean M. Burton   | 55          |
| Steve and Nancy Wigginton   | 56          |
| Bonnie K. Snethen   | 57          |
| Residents Living Adjacent to the Isabel Avenue Corridor in Livermore <sup>1</sup> | 58          |
| Charles E. Voigtsberger   | 59          |
| Gagen, McCoy, McMahon & Armstrong for Crosby Family Trusts, Patricia E. Curtin    | 60          |

**Table H-1 Commenters and Comment Set Numbers** 

<sup>1</sup> Residents include: Daniel Perkins, Robert Strain, Scott Evers, Robert Nafzinger, Jim Sandstrom, Harlen Teetsel, Jerry Atwell, James Carley, Jeannine Bergmann, William Bergmann, Edward LaPlante, Gianna Evers, Karen Northrop, Pete Northrop, Anita Martin, David Martin, Joanne Jerome, Lynnette Jerome, Dianne Jerome, Jeff Jerome, C.L. Nannetti, Gina Higgins, Kirt Higgins, Edward Xavier, J.F. Carley, Kevin Mould, Mitsuka Mould, Nick Dunn, Mike Riehl, Pamela Lynch, Richard Hogan, Irene Hogan, Josh Rocse, Bill Geyer, L. Michelle Geyer, Mike Geyer, Dianna Geyer, Dee Albright, Harold Richards, John LaBrie, C.J. Vers, Gerald Johnson, John Cota, Justin McCraw, Elen Johnson, Karen Strain, Brian O'Connor, James Dremalas, Richard Roy, Debra Post, Tonja Eaton, Susan Unterreiner, Siv Hoffman, Al Hoffman, Kathy Campbell, Mike Campbell, Patricia Gray, Todd J. Gray, Linda Harper, Kris Bidwell, Brad Bidwell, Judy Xavier, Joanne J.V. Madonado, Anthony Maldonado, Lisa Magdaleno, Andrew Maldonado, Joanne Velarde

| Commenter  | Comment Set |
|--|-------------|
| John and Adrienne Potter   | 61          |
| Richard F. Ward  | 62          |
| Richard Carroll  | 63          |
| Matthew and Karen Berry  | 64          |
| MCR Ranch, Christopher R. O'Brien                                      | 65          |
| James and Diane Belak  | 66          |
| Shapell Industries of Northern California, J. Christian Truebridge     | 67          |
| Steve Brozosky   | 68          |
| Lou Astbury  | 69          |
| Robert Russman   | 70          |
| Michael Wendt  | 71          |
| Leland Collins   | 72          |
| Bing & Laura Hadley  | 73          |
| Brian J. Cross   | 74          |
| Karen Hernandez  | 75          |
| Theresa Regan  | 76          |
| Janice and Mike Smith  | 77          |
| Robert J. Harris / Martin W. Inderbitzen (on behalf of the Lin Family) | 78          |
| Patty and Tony Recupero  | 79          |
| Michelle Antila  | 80          |
| Diane Keller   | 81          |
| Larry Gosselin   | 82          |
| Rita Sun   | 83          |
| Eric and Michaele Weasner  | 84          |
| John Vashon  | 85          |
| Nancy Richards   | 86          |
| Brien Traynor  | 87          |
| William M. Schadegg  | 88          |
| Tim Larin  | 89          |
| John & Kim Callahan  | 90          |
| Siv and Al Hoffman   | 91          |
| Claire Leibowitz   | 92          |
| Carolyn and Mark Mason   | 93          |
| Mr. & Mrs. Don Briemle   | 94          |
| Dana Conte   | 95          |
| Linda Therp  | 96          |
| Roy Krausch  | 97          |
| George Gramaglia   | 98          |
| Sharon Gramaglia   | 99          |
| Necita and Harold Smith  | 100         |
| Ted Bolls  | 101         |
| Jeff Haslan  | 102         |
| Barbara Tabak  | 103         |
| Nancy Tietjen  | 104         |
| Steve and Sue Springer   | 105         |

| Table H-1         Commenters and Comment Set Num | bers |
|--|------|
|--|------|

| Commenter  | Comment Set        |  |
|--|--------------------|--|
| Will and Caryn Evangelista   | 106                |  |
| Karla Bailey   | 107                |  |
| Gene & Patricia A. Broadman and Theodore K. Taylor (owners of Parcel #902-0002-004)  | 108                |  |
| Laura Danielson  | 109                |  |
| McCutchen, Doyle, Brown & Enersen, LLP, Cecily T. Talbert (for Centex Homes)   | 110                |  |
| Kiewet Construction Company, Paul E. White   | 111                |  |
| Jereen Gilbert   | 112                |  |
| Lona McCallister   | 113                |  |
| Richard, Sidney and Priscilla Lee  | 114                |  |
| Scott Evers  | 115                |  |
| Carol Gerich   | 116                |  |
| Ed Miracle   | 117                |  |
| Dave Miller  | 118                |  |
| Gerald Hedstrom  | 119                |  |
| Norair and Marina Khachiyan  | 120                |  |
| Foley Family   | 121                |  |
| Zack Margolin  | 122                |  |
| Letter from PG&E Co. (the Applicant)   |                    |  |
| Morrison & Foerster (on behalf of Pacific Gas & Electric Company, PG&E Co.)  | 123                |  |
| Oral Comments Made at Public Participation Hearings  |                    |  |
| Public Participation Hearing: February 8, 2001: Livermore  |                    |  |
| Douglas Goodman, Patrick Duffy, Ed Patriquin (president of Kottinger Ranch Homeowners<br>Assoc.), Cecil Beebe, Brenda Engdahl, Richard Ward, Matt Berry, Leslie Pickett, Gene<br>Broadman, Shawn Zovod, Richard Lee, Rick Camacho, Steve Simoni, Mardi Landes, Fred<br>LaMonica, Chris Feduniw, Betsy Wilson, Teresa Win, Eric Simonds, Ralph Moir, Phil Wente,<br>Sal Sanchez, Bob Harris, Phil Uterreimer, Mayor Cathie Brown, John Stein, Jim Carley, John<br>Kurtzer   | PPH-1 to PPH-56    |  |
| Public Participation Hearing: February 13, 2001: Pleasanton  |                    |  |
| Randall Frost, Diane Burton, Kenneth Burton, Bing Hadley, Glenda Schwem, Kurt Schwem,<br>Colleen Nespor, Larry Snyder, Phil Richardson, Susan Astbury, Matt Sullivan, Paul (Bob)<br>Harris (Lin Family), Doug Huey, Carla Brown-Belcher, Kathy Antrum, Kathy Antrum, Chris<br>Gray (Supervisor Haggerty), Carolyn Newton, Jeannie Pullen, Doug Evans, Jackie Evans,<br>Sharon Heinz, Michelle LaMarche, Mike Rogers, Kara Simone, Michelle Antilla, Claire<br>Leibowitz, Eric Weasner, Charles Voightsberger, Sandra Bierre, Ed Patriquin, Fred LaMonica,<br>Shawn Zovod, Will Kettler, Mark Beckworth, Randy Lum, | PPH 57 to PPH-136  |  |
| Public Participation Hearing: February 15, 2001: Dublin<br>Mayor Dave Hudson, Don Rodrigues, Carol Cirelli, Peter R. Oswald, Donna Dickey, Crista<br>Freihofner, Jeff Haslan, Susan Mills, Diane Clark, Chris Feduniw, Jeff Haslan, Susan Mills,<br>Diane Clark, Bob Harris (Lin Family), Mike Zischke   | PPH-137 to PPH-181 |  |

**Table H-1 Commenters and Comment Set Numbers** 

Appendix 2 presents copies of all comment letters submitted on the Draft EIR, as well as transcripts from the Public Participation Hearings held on February 8, 13, and 15, 2001. Each comment on the Draft EIR presented in Appendix 2 has a corresponding response in this section. The comments and responses are presented in the order shown in Table H-1. To find the response to a particular comment or comment set, note its comment set number from Table H-1 (the comment set number is also shown on the top of each comment letter). Agency comment letters are presented first, followed by letters from the general public and PG&E Co. (the Applicant), and finishing with transcripts from the Public

Participation Hearings. Each comment made at the Public Participation Hearings is numbered, and responses are presented in the same order.

Section H.1 presents detailed responses to general comments that were made by many commenters; these responses are referenced in responses to many individual comments in Sections H.2 and H.3. Section H.2 includes responses to written comments from agencies; Section H.3 presents responses to written public comments; H.4 presents responses to PG&E Co.'s written comments; and Section H.5 presents responses to oral comments made at the February 8, 13, and 15, 2001 Public Participation Hearings.

# H.1 GENERAL RESPONSES TO FREQUENTLY MADE COMMENTS

The following topics address issues that were raised by many commenters and that therefore required detailed responses. General Responses include the following topics:

- GR-1 Electric and Magnetic Field (EMF) health impacts
- GR-2 Technology of constructing and operating underground 230 kV transmission lines
- GR-3 Impacts on property values
- GR-4 Issues related to the S1 Alternative along Isabel Avenue
- GR-5 Concerns related to project components serving only one community but impacting another

# **GR-1 EMF** HEALTH IMPACTS

#### **GR-1.1 Studies About EMF Health Impacts**

A number of comments stated a concern about EMF as a potential health hazard. This issue was addressed in Draft EIR Section C.9.1.2, pages C.9-2 through C.9-11. Commenters also expressed concern that there remains uncertainty in the scientific community as to the health effects of EMF, and that the Proposed Project would result in public exposure to EMF in the vicinity of the transmission lines and substations.

To date there have been hundreds of studies conducted related to the health effects of exposure to EMF from electric transmission lines. Some of these studies identify biological effects but not health effects from exposure to EMF. Some epidemiological studies have shown a weak association between health effects and surrogates of EMF exposure, such as proximity to transmission or distribution lines. In general, the public is unaware that the often cited Wertheimer and Leeper 1979 study, which is seen as establishing widespread public attention on the EMF issue, was based on review of wire codes for electric distribution lines, not transmission lines. Researchers continue to explore whether EMF affects human health; to date they have not been able to demonstrate a health effect, nor have they been able to prove that EMF is <u>not</u> a health risk. Lacking proof that EMF is not a risk, the public's perception of EMF as a health risk remains the strongest driver behind continuing research in this area.

Comments on the Draft EIR include reference to recently released studies. In particular, a September 2000 study released in the British Journal of Cancer is referred to as a sudden scientific breakthrough on the relationship between EMF and cancer. The referenced study reviewed the pooled analysis of the results from nine recent studies. The 12 researchers involved estimated a summary relative risk of 2.0. The relative risk factor resulting from this

study is consistent with other earlier studies, and does not represent an advancement in determining a health risk from EMF. The study authors concluded "The explanation for the elevated risk is unknown, but selection bias may have accounted for some of the increase."

The National Radiation Protection Board of the United Kingdom also issued a statement on March 6, 2001, following a report by its Advisory Group on Non-ionizing Radiation (AGNIR). The Board concluded that the question of whether exposure to EMF can influence the development of cancer could not at present be completely resolved. They also note that the review of experimental studies by AGNIR gives no clear support for a causal relationship between exposure to EMF and cancer. Finally, they state that the Board considers that the AGNIR report provides no additional scientific evidence to require a change in exposure guidelines.

The Draft EIR, page C.9-6, includes the results of scientific review panels that have considered the body of EMF health effects research, and determined that the data does not provide evidence to conclude that transmission line EMF causes cancer or otherwise constitutes a health hazard. The foregoing recent results are consistent with the information presented in the Draft EIR.

# **GR-1.2** Levels of EMF Exposure

In terms of public exposure to EMF in the vicinity of the proposed facilities, Section C.9.1.2 of the Draft EIR included the estimated EMF levels from PG&E Co.'s proposed facilities. For the overhead 230 kV line configuration, magnetic fields were shown as ranging from 41 to 56 milliGauss (mG) below the line, 15 to 18 mG 50 feet from the line, and 5 to 6 mG 100 feet from the line. For the underground 230 kV line configuration, magnetic fields were estimated at 29 mG above the line, 6 mG 15 feet from the line, and 1 mG 50 feet from the line.

The public routinely experiences exposure to EMF in the community from sources other than electric transmission lines and substations. Tables C.9-1 and C.9-2 on page C.9-5 of the Draft EIR presented values of electric and magnetic fields from household appliances. This information indicates that public exposures to fields from appliances are significant, but are greatly reduced a foot away from the appliance. In a number of studies where residential magnetic fields were measured, field strengths within rooms and away from appliances were found to average between 0.5 mG and 1 mG. For homes which use their water system as the ground connection for their home wiring, the field averaged near 2 mG. These studies were conducted in the United States and in Europe, and included home samples from approximately 40 residences up to over 2,000 residences (Public Utility Commission of Texas, *Health Effects of Exposure to Powerline-Frequency Electric and Magnetic Fields*, March 1992).

Outside of the home, the public also experiences EMF exposure from the electric distribution system that is prevalent in all areas of the community. Estimates of the magnetic field exposures to the public from overhead 12.5 kV distribution lines range from 22 mG below the lines, 8 mG 40 feet from the lines, and 2 mG 100 feet from the lines. In areas of underground distribution, which typically occurs in residential areas, the 12.5 kV circuits are not buried as deeply as transmission lines, and are not arranged to optimize field cancellation. The estimated fields for underground distribution lines range from 31 mG above the line, 4 mG 40 feet from the line, and 1.9 mG 100 feet from the line (Washington State Department of Health, *Electric and Magnetic Field Reduction: Research Needs*, January 1992). Note that these figures are higher than those for PG&E Co.'s Proposed Project.

Reviewing the foregoing information indicates that the public's exposure in the community, from sources other than electric transmission lines and substations, is routinely at magnetic fields levels discussed in studies of potential health effects. In the case of overhead transmission line construction, the fields directly below the proposed 230 kV facilities will be at levels greater than commonly encountered in the community from electric distribution lines. However, the field levels at the edge of the right-of-way are below the field levels expected in the community today. In the case of underground transmission line construction, the fields directly above the proposed 230 kV facilities will be below the field levels expected in the community today due to the presence of underground distribution lines.

Installing a 230 kV transmission line underground can be used as a method to reduce EMF from an overhead 230 kV line. In order to address the public's perception and concerns relative to EMF health risks, the use of underground construction is regularly recommended as a mitigation measure where a new line would be in the vicinity of schools.

# **GR-2** TECHNOLOGY OF CONSTRUCTING AND OPERATING UNDERGROUND 230 KV TRANSMISSION LINES

Multiple comments submitted on the Draft EIR referred to the use of underground transmission lines as unproven technology, and even quoted portions of Draft EIR Appendix 2, the Technology and Environmental Assessment Guide on Underground HV Power Transmission. In addition, some comments questioned fire and explosion hazards from underground transmission lines, questioned whether these types of lines had ever been constructed in residential areas, and expressed concerns that maintenance would impact the community due to re-excavating the cables for repair.

Underground electric power cables have been in use in the United States for over 50 years. The application of underground electric power cables initially began at distribution voltages (12 kV), but has been used in California at 115 kV since 1952. For decades, underground electric power cables have used oil-filled paper, insulated conductors, or high-pressure oil filled pipe-type cables up to transmission voltages of 500 kV. Although these types of cables did have potential environmental impacts and some fire hazard due to the use of oil for insulation and cooling, they were designed and installed in a manner that protected the public. The national and California codes (G.O. 128) establish design and construction requirements that safeguard workers and the public. There are over 2,000 miles of underground transmission lines in the United States; these lines do not present any greater safety risk to the public than overhead transmission lines. Section C.9.1.1 of the Draft EIR further discusses underground transmission line safety.

The reason that underground transmission has seen limited use is that, historically, the use of underground transmission technologies had a significant cost differential to overhead construction, approaching the point where it was 10 to 15 times more costly.

The type of underground cable proposed by PG&E Co. uses solid dielectric insulation in lieu of oil-filled papers or pipe. This type of insulation represents an advancement in technology and avoids the environmental concerns associated with oil spills or fire hazard that can result from oil-filled pipe. As for most electric power cable advancements, these materials were first used at distribution voltages, and have progressed to transmission voltages as materials and manufacturing processes were developed. Solid dielectric cables were in use in the United States at distribution level in the 1940s, and were first used for 230 kV in Japan in 1979. In

1987, when the Technology and Environmental Assessment Guide on Underground HV Power Transmission was first developed, utilities in the United States limited their use of solid dielectric cables to 138 kV and below. In the November 2000 update of Appendix 2 (to the Draft EIR), the Foreword points out that improved manufacturing processes for purer compounds, and the use of dry curing instead of steam curing, has led to the use in the United States of solid dielectric cables at 230 kV since 1992, with an installation at 345 kV presently underway in the Boston area.

With regard to the use of underground cables in residential areas, undergrounding is often suggested as a means to mitigate other impacts, primarily visual. Underground transmission line cables have existed for a number of years in residential areas of the United States, with one installation in California dating to 1986 (by the Sacramento Municipal Utility District; two miles long and connecting three different substations), and at least one solid dielectric installation dating to 1993 in Tamaqua, Pennsylvania (about one mile long) that was undergrounded because it traversed a residential portion of town.

The underground construction proposed by PG&E Co. would first construct a concrete ductbank with sections of ductbank tied together at underground vaults. Since the solid dielectric cable is relatively stiff, it is placed in straight sections and is spliced together in vaults at the locations where the cable needs to turn the tightest corners. Independent engineers hired by PG&E Co. evaluated the existing underground utilities in Pleasanton's Kottinger Ranch area, and concluded that (a) there is adequate space in the roads for installation of the underground line, and (b) the underground cable has sufficient turning radius to be installed within the roadway right-of-way, not affecting any private property. This information, along with detailed street diagrams, was presented in PG&E Co.'s February 14, 2001 Rebuttal Testimony to the CPUC.

The buried concrete ductbank and vault system provide substantial cable protection from dig-in, and also contain the cable under fault or failure situations. Maintenance impacts are not anticipated since any necessary cable repairs can be conducted without re-excavating the cable; the old cable is simply pulled out of the duct and replaced with a new cable section. As noted in the Draft EIR, Section C.9.1.1, to improve underground cable repair response time, the CPUC is urged to require that several thousand feet of spare cable be stocked by PG&E Co. at all times.

# **GR-3 PROPERTY VALUES**

Many commenters expressed a concern about potential adverse property value impacts of the Proposed Project or Project Alternatives. As cited in Section C.10.2.2 of the Draft EIR and CEQA Guidelines Section 15131, economic or social effects of a project *per se* are not considered as significant effects on the environment. However, such issues can be considered by the CPUC in its General Proceeding, as discussed in the Draft EIR, Sections A.1 and A.3.

As cited in the Draft EIR, a great deal of research has been conducted on property value impacts of industrial uses and transmission lines. Although there is evidence that transmission lines have affected property values in some cases, the effects are generally smaller than anticipated and primarily affect property located within 400 feet of the transmission line (see Draft EIR Section C.10.2.2, page C.10-9). Impacts on property values result from visual impacts, or concerns health and safety. These issues and potential impacts are analyzed extensively in the Draft EIR, Section C.12 (Visual Resources) and Section C.9 (Public Health, Safety, and Nuisance). Where potential visual impacts were deemed significant, mitigation

measures were suggested to reduce them to less-than-significant levels. If visual impacts are less than significant, property value impacts are unlikely to be significant.

#### **GR-4** ISSUES RELATED TO THE S1 ALTERNATIVE ALONG ISABEL AVENUE

Many commenters presented concerns about aspects of the overhead portion of the S1 Alternative along Isabel Avenue. In order to fully respond to these issues, this General Response is divided into several sections:

GR-4.1 Potential for installing the transmission line underground along Isabel Avenue

GR-4.2 Visual impacts along Isabel Avenue

GR-4.3 Noise from the overhead transmission lines

#### **GR-4.1** Potential for Installing the Transmission Line Underground Along Isabel Avenue

Section B.6.1.1 of the Draft EIR defined the S1 Alternative as being installed underground in the portion along Vineyard Avenue between Highway 84 and Isabel Avenue, but overhead in all other portions, including the segment along the west side of Isabel Avenue from Vineyard to Stanley Boulevard. Many commenters were concerned about the visual impact of the Isabel route segment (see detailed response to those concerns in General Response GR-4.2, below), and suggested that this segment be installed underground. The Draft EIR (Section B.5.4.1.8) explained that the Isabel Avenue portion could not be installed underground for the following reasons:

This alternative could conflict with Caltrans' Highway 84 Extension Project. Caltrans does not generally allow installation of underground facilities within their ROW. Immediately west of Isabel, there are gravel pits and access roads. In some places, the pits are close to the west side of the road so there would be stability concerns related to the underground duct bank. This would not be a concern with the overhead lines because the towers would be located between the pits and the conductors could hang over the pits between towers.

The following discussion expands on that explanation, and presents four subsections: Caltrans Permission, Feasibility of Undergrounding on West Side of Isabel, Feasibility of Undergrounding on East Side of Isabel, and The Perceived Unequal Treatment of this Alternative Compared to Others.

**Caltrans Permission.** Several commenters requested that EIR preparers verify with Caltrans that the policy expressed in Draft EIR Section B.5.4.1.8 would apply to this project. Caltrans submitted a comment letter on the Draft EIR (see Final EIR Appendix 2, Comment Set M), in which it addresses this issue:

For longitudinal encroachments, Caltrans has adopted the policy of the American Association of State Highway and Transportation Officials (AASHTO), which reads:

New Utilities will not be permitted to be installed longitudinally within the control of access lines of any freeway, except that in special cases such installations may be permitted under strictly controlled conditions. Utilities will not be allowed to be installed longitudinally within the median area.

Given the availability of two other EIR Alternatives (S2, S4), it cannot be argued that undergrounding within the SR 84 right-of-way is warranted as a "special case" exception to the foregoing Caltrans policy. Further, the CPUC does not consider it necessary to further explore the prudence of locating a high-voltage underground transmission conduit at the edge of active gravel mining pits.

Following a meeting with PG&E Co., Caltrans prepared another letter (February 26, 2001) that states more specifically: "Following AASHTO's policy, Caltrans **will not** permit any new utilities to be installed longitudinally within the access control lines of any freeways or expressways in general or along Isabel Avenue in the City of Livermore in particular."

**Feasibility of Undergrounding on West Side of Isabel.** As described in Draft EIR Section B.5.4.1.8, installation of the transmission line underground along the west side of Isabel Avenue (and outside of the Caltrans right-of-way) is considered to be infeasible due to the proximity of the existing gravel pits to the roadway right-of-way. The northern half of Isabel (within a mile of Stanley Boulevard) is the area of greatest concern regarding this issue, as there are locations where the road right of way extends nearly to the edge of the gravel pits. The overhead lines that could be constructed here would be supported by towers located on the access roads that divide the gravel pits, and the lines themselves would be suspended over the pits.

The roadway nearer to Stanley is somewhat constricted due to the interchange construction and the housing on the east side. According to the City of Livermore's traffic engineer, Ken Ross, if and when Caltrans extends the roadway to six lanes, the northernmost portions may actually have to be constructed over the gravel pits.

The opinion that installation of an underground line west of Isabel would be infeasible was supported in the CPUC's General Proceeding, where a geologist hired by the City of Pleasanton (Dr. Orrin Sage) was questioned by Administrative Law Judge (AJL) Michelle Cooke as to the viability of this route. On page 806 of the hearing transcripts, Dr. Sage states the following:

Based on the photos and based on the description in the EIR, it seems that there's some problems there [on the west side] because you have quarry property and you have existing excavations. So that would be much more problematic in terms of trying to construct through there unless you were probably directly adjacent to the roadway. But the east side would be the preferred location.

In conclusion, the CPUC still feels that it is not feasible to install an underground transmission line west of Isabel Avenue.

**Feasibility of Undergrounding on East Side of Isabel.** During late 2000 and early 2001, after the Draft EIR was released, the City of Livermore has been installing landscaping, a noise berm, a bicycle/walking trail, existing distribution power lines (relocated from the narrower Isabel Avenue), and underground utilities in the area east of the roadway along Isabel. There are between 150 and 700 feet from the walls of the residences adjacent to Isabel to the edge of the roadway. The landscaping and elevations vary along Isabel Avenue.

According to the City of Livermore (Ken Ross, engineer), it would not be feasible to install the transmission line within the noise berm (which exists only along the northern half of the street, north of Concannon) since that berm consists of uncompacted fill that could not support the

weight of the transmission ductbank. In addition, installation within the berm would limit PG&E Co.'s access for maintenance purposes. This leaves only the trail area for transmission line installation, and within this area the City has installed a reclaimed water line.

**Perceived Unequal Treatment of this Alternative Compared to Others.** Several commenters expressed concern that the City of Livermore was treated differently than other jurisdictions by EIR preparers in development and evaluation of alternatives. As the Lead Agency for transmission line projects, the CPUC as a State agency, is able to independently analyze technical issues. In developing EIR alternatives, feasibility issues and potential impacts were considered equally for all areas. Mitigation measures or alternatives requiring installation of lines underground rather than overhead were presented (a) where they were technically feasible, and (b) to protect valued viewsheds were developed in several areas of Livermore: Sycamore Grove Regional Park, East Vineyard Avenue, Manning Road, North Livermore Avenue, May School Road, and the L2 Alternative along the Isabel corridor north of Jack London Avenue. General Responses GR-4.2 and GR-4.3 below further explain the visual and noise impact analysis for Alternative S1.

# **GR-4.2** Visual Impacts Along Isabel Avenue

A number of comments reference concerns about the potential visual impacts of an overhead transmission line along Isabel Avenue. Specific areas of concern included visual impacts to several categories of observers: residents along the east side of Isabel Avenue, motorists on Isabel Avenue, users of a proposed multi-use trail along the east side of Isabel Avenue, and users of the future Chain of Lakes recreation area, as well as the potential conflict with the City of Livermore Scenic Route Element with respect to Scenic Corridors.

The visual analysis conducted for the Draft EIR (Section C.12.3.2.3) concluded that the S1/L2 Alternatives would result in an adverse but not significant visual impact. The following paragraphs further elaborate on the basis for that conclusion by area of concern in response to comments received.

**Visual Impacts to Residents Along Isabel Avenue.** The visual impact of the S1/L2 Alternatives on residents along the east side of Isabel Avenue was not considered significant based on three contributing factors: (1) view orientation, (2) available screening and restriction of views, and (3) quality of the available views. The primary view orientation of all of the residences bordering Isabel Avenue is to the east, that is, the fronts of the houses face to the east, away from the direction of the S1/L2 Alternatives. While the two-story residences do have upper floor windows at the rear of the residences which provide views to the west, none of the structures are designed with decks or balconies to fully exploit a western orientation. Except for some of the residences of the Sandhurst Development (immediately north of Concannon Boulevard), the lower floor windows generally do not have tall "picture windows" capable of substantially exploiting views to the west.

The second factor contributing to the "not-significant" impact determination is the screening available to many of the residences and the resulting restriction of view. Between East Jack London Boulevard and Stanley Boulevard, most of the residences are single-story with backyard fences, many with trees and vegetation that effectively screen views to the west (see Draft EIR Figure C.12-23). Just north of Stanley Boulevard, there are less than a dozen two-story homes that have backyard walls that will screen much of the views from the ground floors of the residences. The second-floors of these residences do not have decks, balconies, or

unusually large windows to exploit the westerly view. Between Stanley Boulevard and Ida Holm Park to the south, the residences are typically single-story with backyard fences that effectively screen much of the view to the west. Between Ida Holm Park and Concannon Boulevard to the south is the Sandhurst Development. As mentioned above, these residences do have large windows on the west side of the structure but there are backyard walls that will block a portion of the view to the west. Between Concannon Boulevard and Vineyard Avenue to the south is the Prima Development. Again, the backyard walls will screen much of the view from the first floor of these residences. Therefore, views of the hills to the west and south are generally limited to upper floor windows due the ground level screening provided by walls, fences, and vegetation. For most of the residences within the interior of these developments, foreground residences along the western perimeters of the developments will substantially screen views to the west.

The quality of the existing and future views from residences was also a contributing factor in the impact determination. It is acknowledged that given the height of the proposed structures, the upper portion of the towers (which will be single tubular poles) and the conductors would potentially be visible above the backyard fences and walls from both ground floor and upper floor windows and backyards, depending on available screening. As described above, views to the west from the single-story residences south of East Jack London Boulevard will be very limited, though the few two story residences would have views to the west from upper floor windows. From just north of Stanley Boulevard to Vineyard Avenue, an existing distribution line runs along the east side of Isabel Avenue, and would be a prominent feature in views from either ground level or second floor windows (this line is not going to be moved underground, contrary to the beliefs of some commenters). From ground floor windows, fences and walls would block most of the view to the hills to the west and south, which are considered higher quality visual elements. Above the fences and walls, the existing utility pole with five wires (electric distribution lines and cable) would impair views of hill tops and open sky. The S1/L2 Alternatives could be visible either above or through these existing structures and lines. However, due to the height of the structures, the conductors would not obstruct views of the hills. Also, given the spacing of the structures, views due west from any given residence window would see at most one structure and the conductors. In some cases, neither the structures nor conductors would be visible from ground floor rooms. Views to the north or south would encompass more structures and a greater expanse of the conductors.

From second floor windows, views would encompass Isabel Avenue, the existing distribution line, the active quarry, and the S1/L2 Alternatives. Isabel Avenue with its barriers and signage is currently a two-lane road that will be expanded to four lanes under City of Livermore jurisdiction and then possibly to six lanes under CalTrans. The current speed limit is 50 miles per hour. The wood pole structures in the immediate foreground support five electric distribution and cable utility wires. The quarry in the background is expected to remain active for the foreseeable future, given permitted rights through at least 2030, and mining operations (including excavation and hauling) will take place in the immediate vicinity of Isabel Avenue. The S1/L2 Alternatives would be visible either through or above the existing utility lines and would be seen in the context of the expressway and active quarry.

As for ground floor views, while the existing utility lines impair views of the hills to the west and south, the S1/L2 conductors would generally be located above the horizon line of the hills to the west and south and thus would not substantially block views to those higher quality visual elements. Views from some of the other homes in the residential developments that are not located on Isabel Avenue would be able to see the S1/L2 Alternatives transmission towers and lines either above or between houses. However, these views would be dominated by the intervening homes in the immediate foreground of these residential views. In some cases, the S1/L2 Alternatives would be visible along with the existing utility lines. At the intersection of Isabel Avenue and Vineyard Avenue, a transition structure would be located near the northwest corner. The transition structure would be double pole and more massive than the transmission structures. However, views of the transition structure from the southern-most residences along Isabel Avenue would encompass the existing utility lines on the east side of Isabel Avenue. Within this infrastructure context, the transition structure would result in an adverse but not significant visual impact. Overall, the S1/L2 Alternatives were determined to result in adverse but not significant visual impacts to the residences along Isabel Avenue.

It should be noted that while some comments refer to the removal of the existing distribution line, this line has been recently relocated to its current position east of Isabel Avenue and there are no plans to either relocate or underground the line in the future, according to the City of Livermore and PG&E Co.

**Visual Impacts to Motorists Along Isabel Avenue.** As illustrated in Figure C.12-5 of the Draft EIR, the existing views available to motorists encompass a foreground landscape that is dominated by suburban residential development, existing utility and transportation infrastructure, and the altered landforms of the adjacent quarry. The middle ground landscape is dominated by the spread of residential development across the foothills and alluvial fans of the southern hills. The upper portions of the background hills to the south are undeveloped and covered with oak woodland habitat. The six-lane expressway that will replace Isabel Avenue will dominate future foreground to middle ground views. While the addition of the S1 or L2 Alternatives into this transitioning landscape would certainly result in an adverse visual impact, it would not be considered significant within the context of the present and future development that includes existing utility lines, suburban residential development, a major roadway, and an active quarry.

Visual Impacts to Users of the Multi-Use Trail Along Isabel Avenue. Users of the regional trail proposed along the east side of Isabel Avenue would be adversely impacted by views of the S1/L2 Alternatives. However, the visual impact must be considered within the context of the visual quality of the trail viewshed. This portion of the trail would pass through a developed urban corridor that is continuing to develop with additional residential structures and infrastructure. The trail route would parallel residential development from Vineyard Avenue to East Jack London Boulevard. It would be located adjacent to an existing roadway that is developing into a six-lane expressway with a 50 mile per hour speed limit. For that portion of the trail between Vineyard Avenue and Stanley Boulevard, the route would parallel existing overhead utility lines and pass under electric distribution and transmission lines along Stanley Boulevard. To the immediate west of the route is an active quarry that is going to experience ongoing mineral extraction activities immediately adjacent to Isabel Avenue during the next several decades to come. While there are distant, open views to the west across the quarry area, the overall developed and developing foreground visual context within which the S1/L2 Alternatives would be placed prevents the resulting visual impact from being classified as significant.

The Description column for Key Viewpoint (KVP) 4 in Table C.12-6 of the Draft EIR (Visual Analysis Summary) is hereby appended to add "multi-use trail users" to motorists and adjacent residents as the viewing population.

**Visual Impacts to Users of the Chain of Lakes Recreation Area.** Regarding the future Chain of Lakes that will be established west of Isabel Avenue and north of Stanley Boulevard, it should be noted that these quarry properties will eventually be deeded to Zone 7 of the Alameda County Flood Control and Water Conservation District for use as water management facilities. It is expected to be another 30 to 50 years before the lakes are fully developed, and it is unlikely that the lakes will be publicly accessible. They are not intended to serve primarily as recreational facilities. Any limited recreational use that Zone 7 decides to permit along the edges of the lakes will be subservient to the lake's primary function as water management/storage facilities and minimal use, if any, would be anticipated in proximity to Isabel Avenue. To the extent there are vista views over the chain of lakes to the west from the eastern boundary along Isabel Avenue, the S1/L2 Alternatives would minimally impair those views, if at all, given that the transmission line would also be located along the eastern perimeter and the conductors would be suspended above the viewing locations.

Visual Impacts Resulting from a Conflict with the City of Livermore Scenic Route Element.

Isabel Avenue is identified in the Scenic Route Element of the *City of Livermore Community General Plan* as a proposed scenic route. The Draft EIR did not identify a conflict between the S1/L2 Alternatives and this designation because the alternative alignment is located outside the planning jurisdiction of the City. Therefore, Livermore's General Plan does not apply to this alignment. The provisions of the *Alameda County General Plan* do apply, and potential conflicts of the S1/L2 Alternatives with this governing document are addressed in Section C.7.3.2 of the Draft EIR.

# **GR-4.3** Noise Impacts From Overhead Line Along Isabel Avenue

The residential property lines on the east side of Isabel Avenue are approximately 150 feet to 740 feet from the east side of the existing right of way of Isabel Avenue (City of Livermore, 2001). As described in Section B.6.1.1 of the Draft EIR, the location of the S1 route is about 40 feet west of the roadway. This description considers the "roadway" at *future* conditions (Caltrans plans to add four more lanes to the west side of Isabel Avenue as part of State Route 84). Assuming each lane would take approximately 15 feet of additional right of way, the houses along the east side of the road would be approximately 220 feet to 810 feet away from the transmission line towers.

As described in the Noise section Draft EIR (Section C.8.3.1.2, page C.8-16), the worst-case scenario of corona noise from the proposed transmission line could be as loud as 45 dBA at a distance of 250 feet during stormy or very thick fog conditions. This would equate to potential noise levels at the residence property lines of between approximately 36 dBA to 46 dBA. This level of noise would not exceed the EPA recommended guideline for outdoor noise in residential areas (55 dB), or the City of Livermore's designated normally acceptable noise level for residential areas (60 dB). In addition, Isabel Avenue itself would be located between the residential receptors and the alternative transmission line route. Isabel Avenue experiences relatively high average daily trip levels, and can be expected to generate sound levels of approximately 60 dBA to 70 dBA. This sound level would effectively drown out the audible corona noise at the sensitive receptor locations. For the reasons described above, potential impacts related to corona discharge noise along Alternative S1 are anticipated to be adverse, but less than significant **(Class III)**.

# **GR-5** CONCERN THAT THE PROJECT WOULD SERVE ONE COMMUNITY WHILE AFFECTING OTHERS

Several commenters expressed concern that a particular portion of the Proposed Project would serve only one community and therefore, that community should bear the impacts of that line portion. This is contrary to the general principles governing design and operation of electric transmission and distribution lines. To ensure reliability, these lines are generally constructed to be part of a "loop" so that in the event of an outage, an area can always be served from another source. In the case of lines in Livermore and Pleasanton, the Livermore Substations (Las Positas and Livermore) can provide power to Pleasanton (Vineyard Substation), and conversely, the Vineyard Substation can provide power to Livermore. As shown in the Draft EIR Figures A-1 and A-2, the entire Tri-Valley area is part of an interconnected regional network of transmission and distribution lines, and no area can (or should) be isolated, providing power only for itself.

# H.2 RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR FROM AGENCIES

#### COMMENT SET A: CITY OF LIVERMORE

- A-1 No response needed; the commenter's support for Alternative P3 as the Environmentally Superior Alternative in North Livermore (as found by the Draft EIR) is acknowledged.
- A-2 No response needed; the commenter's positions on the cited alternatives and Proposed Project will be considered by the CPUC in formulating its decision on PG&E Co.'s application. Responses to more detailed comments follow.
- A-3 Isabel Avenue is identified in the Scenic Route Element of the *City of Livermore Community General Plan* as a proposed scenic route. The Draft EIR did not identify an impact for Alternative S1 related to a conflict with this designation because this alternative alignment is not located within the City of Livermore, and is therefore outside the planning jurisdiction of the City. In other word's, Livermore's general plan does not apply to this alignment; rather, the provisions of the *Alameda County General Plan* apply, and potential conflicts of Alternative S1 with this governing document are addressed in Section C.7.3.2 of the Draft EIR.

While there are homes north and south of Stanley Boulevard to the east of Isabel Avenue, there are no residences along the portion of Stanley Boulevard that would be traversed by the Alternative S1 transmission line. It is acknowledged in Section C.7.3.2 of the Draft EIR that the overhead transmission line would be visible to some residents living east of Isabel Avenue, and this would include those who live adjacent to Stanley Boulevard. Regarding the City of Livermore's designation of Isabel Avenue as a scenic route, please see Response to Comment PPH-35.

With respect to the planned LARPD recreational trail along Isabel Avenue, the lack of discussion in the Draft EIR represents an oversight, which is remedied by the following revised text:

pages C.7-49 through C.7-50:

# **Adverse Effects on Regional Trail Users**

The placement of the S1 transmission line along Stanley Boulevard would adversely affect hikers and bicyclists along a planned regional trail on the north side of the roadway. The

East Bay Regional Park District's Master Plan 1997 trails and parks map designates the north side of Stanley Boulevard as the future alignment for the San Joaquin County to Shadow Cliffs Regional Trail. Future trail users would be exposed to EMFs and the visual intrusion of the overhead transmission line. Exposure to EMFs would be limited by the distance of the transmission lines from the trail and the short duration of exposure. In addition to the height of the lines above the trail, the trail would laterally separated from the transmission line, which would closely parallel the Union Pacific Railroad tracks. While the exact trail alignment has not yet been determined, the railroad would be unlikely to allow a public-access trail immediately adjacent to an active rail corridor. For additional information on exposure to EMFs, please refer to Section C.9, Public Health, Safety, and Nuisance.

With respect to the visual effects, the transmission line would be located in a context of an industrial area that has few remaining natural amenities. The surrounding gravel mining operations, heavy truck and auto traffic, adjacent railroad operations, and existing power lines all contribute to degraded visual conditions in the area.

Alternative S1 would also be located in proximity to a planned regional trail along the east side of Isabel Avenue. The Livermore Area Recreation and Park District Master Plan 1995 identifies Isabel Avenue as a potential trail. Development of this trail has been tied to the ongoing construction of residential housing to the east of Isabel Avenue, and is expected to be completed in the near future. While future trail users would not be exposed to EMFs, they would experience a similar visual intrusion of the overhead line into their viewshed as along Stanley Boulevard. While the visual context along Isabel Avenue is not nearly as industrial as along Stanley Boulevard, it is nonetheless a setting that is anything but natural. Extensive residential development flanks the trail alignment to the east, with a continuous plain wall enclosing the development. Immediately to the west of the future trail is Isabel Avenue, which is slated for expansion to a six-lane freeway in a realigned State Highway 84. An existing overhead 60-kV electric distribution line is located along the east side of the roadway. To the west is an active gravel quarry operation, which is expected to be actively mined at least until 2030. Given this existing context, the visual impact of the overhead transmission line on future trail users along Isabel Avenue would not be significant.

With respect to the visual effects, the transmission line would be located in a context of an industrial area that has few remaining natural amenities. The surrounding gravel mining operations, heavy truck and auto traffic, adjacent railroad operations, and existing power lines all contribute to degraded visual conditions in the area. In this <u>Given the</u> existing and foreseeable context of the planned EPRDP trail along Stanley Boulevard and the planned LARPD trail along Isabel Avenue, the addition of the transmission line <u>along</u> these roadways would create an adverse, but not significant, impact on future recreational trail users **(Class III)**. More details on this visual impact are provided in Section C.12, Visual Resources.

The City's opposition to Alternative S1 is acknowledged and will be considered by the CPUC prior to making a decision on whether or not to approve the Proposed Project or one of the alternatives to the project.

A-4 Regarding Sycamore Grove Regional Park, please see Response to Comment PPH-145. Regarding sensitive plant and animal habitat in the park, see Draft EIR Section C.3

- A-5 Please see General Response GR-4.
- A-6 Please see General Response GR-4.
- A-7 No response needed; the commenter's position on the cited alternatives and Proposed Project will be considered by the CPUC in formulating its decision on PG&E Co.'s application. Responses to more detailed comments follow.
- A-8 The comment is consistent with the findings of the Draft EIR, which identifies significant, unavoidable visual impacts related to the proposed transmission line and substation in North Livermore (Sections C.7.5.1.2 and C.12.5.1). In Section C.7.5.1.2, the Draft EIR also identifies impacts related to conflicts with policies in both the *North Livermore Specific Plan* and the *North Livermore General Plan Amendment*, and recommends measures (Mitigation Measures L-16, L-17 and L-18) to reduce the impacts to less-than-significant levels. Both Mitigation Measure L-16 and Mitigation Measure L-18 require PG&E Co. to consult with the relevant local planning jurisdiction, and make every reasonable effort to comply with the local design standards. This will afford the City of Livermore the opportunity to apprise the Applicant of any changes to plans for urban development in North Livermore between now and the time the project is implemented.
- A-9 As the City references in comment A-12, its "Alternative 1" for the North Livermore substation and transmission line siting is reflected in the Draft EIR's Alternative P2.
- A-10 No response needed; the CPUC appreciates the City's recognition of the EIR alternatives screening process, and its acceptance of the results (the elimination of its Alternative 2, the Dagnino Road Alternative).
- A-11 The City's support for Alternative P2 is acknowledged. The City's recommendation that the existing overhead distribution lines along North Livermore and Manning Roads also be undergrounded is not within the scope of this EIR. If introduced in the General Proceeding, the CPUC may consider the City's recommendation; otherwise, the CPUC's existing program (under its Rule 20) for converting overhead lines to underground should be pursued by the City.
- A-12 As the City references in this comment, its "Alternative 1" for the North Livermore substation and transmission line siting is reflected in the Draft EIR's Alternative P2.
- A-13 The City's opposition to Alternative L1, due to its development of protected endangered species habitat nearby, is acknowledged. These concerns are reflected in the Draft EIR's analysis of this alternative.
- A-14 The regulations governing new construction in the vicinity of Livermore Airport, including height restrictions, are addressed in the Draft EIR on pages C.7-16–C.7-17 and C.7-23–C.7-24. An impact related to the penetration of Livermore Airport's airspace by Alternative S1 support towers is identified in Section C.7.3.2. Mitigation Measure L-11 would require the applicant to initiate an aeronautical study with the Federal Aviation Administration, which would ensure that the alternative would not conflict with safe air navigation. In Section C.7.5.5 of the Draft EIR a related impact pertaining to safe air navigation is identified for Alternative L2. Support towers for the L2 alignment would exceed 40 feet in height within a 5,000-foot radius around the airport, in conflict with the Livermore Zoning Ordinance. Mitigation Measure L-20 would

require the portion of the L2 alignment within 5,000 feet of the airport to be placed underground.

The City's objection to Alternatives L2 and S1 is acknowledged and will be considered by the CPUC prior to making a decision on whether or not to approve the Proposed Project or one of the alternatives to the project.

- A-15 Please see Responses to Comments A-1 and A-2.
- A-16 Please see Response to Comment A-14. Although the Alternative D1 support towers may not interfere with air navigation around Livermore Airport, the commenter has identified an oversight in the Draft EIR related to this issue. Similar to Alternative S1, the D1 alignment would protrude into one of the Federal Aviation Administration (FAA) boundaries requiring an aeronautical study. It would also be located in the General Referral Area established around the airport by the Alameda County Airport Land Use Commission (ALUC), and would therefore require review by the ALUC. While it may not penetrate FAA imaginary surfaces defining obstructions to air navigation, the manager of Livermore Airport has expressed concerns about the potential for the Alternative D1 alignment to create such an obstruction, regardless of the FAA regulations. It is not for the preparers of this EIR to make a final determination on whether or not the D1 alignment would create an obstruction to air navigation; the determination should be made by the FAA, Alameda County ALUC, and Livermore Airport. Accordingly, the following revisions are made to the Draft EIR:

page C.7-49, 3<sup>rd</sup> paragraph:

"L-11 If Alternative S1 is approved by the CPUC, PG&E Co. shall immediately initiate an FAA Aeronautical Study by submitting FAA Form 7460-1 to the Western Pacific Region of the FAA. The Applicant shall comply with any requirements identified by the FAA, including those pertaining to the marking and lighting of transmission line support towers. <u>The CPUC shall also submit</u> the project to the Alameda County ALUC for review, and shall comply with the recommendations of that agency, including disapproval of the alternative if the ALUC determines that the alternative would create an obstruction to air navigation and no suitable mitigation is feasible."

page C.7-53, 6<sup>th</sup> paragraph:

"Similar to the impact identified for Alternative S1, this alternative would cross land designated by the State Department of Conservation as Prime Farmland, and the support towers would remove this land from potential production. Some of the designated land is currently being quarried for gravel. While the west side of El Charro Road south of I-580 and north of Milepost 15.2 is currently agricultural land, the transmission line support towers would be placed in the fire break along the edge of the roadway. Consequently, no active agricultural land would be removed from production. This would therefore be a Class III impact, requiring no mitigation. Also similar to Alternative S1, Alternative D1 would protrude into FAA boundaries around Livermore airport, and could potentially create an obstruction to air navigation. This would be a significant but mitigable impact (Class II). The same mitigation measure (L-11) identified for the Alternative S1 impact would apply to this alternative."

Regarding the crossing of Sycamore Grove Regional Park by the Alternative S2A alignment, that variant to Alternatives S1/S2/L2 was developed specifically to avoid crossing the park, and at the time of publication of the Draft EIR, it was believed to accomplish that objective. Now that this conflict has been identified, a new variant to the S1/S2/L2 Alternatives has been developed and is evaluated in Section B of this Final EIR.

The comment is acknowledged and will be considered by the CPUC prior to making a decision A-17 on whether or not to approve the Proposed Project or one of the alternatives to the project. The preparers of the Draft EIR reached a different conclusion regarding the severity of the visual impact of the Stanislaus Corridor Alternative, as documented in Section C.12.6.3. The analysis is based on the visual simulation presented on Figure C.12-26, which shows that, while the new support towers would be taller than the existing towers, they would be spaced further apart, requiring fewer support tower locations across the valley. Furthermore, each tower location would support a single tower, rather than the existing two towers at each location. The footprint of each tower would also be reduced. As viewed from most public vantage points, the taller support towers would not visually protrude above the ridgelines of the hills to the south, but would appear co-dominant. The conclusion of the Draft EIR is that the impact severity would be low to moderate. Given the context of the existing landscape (including an existing network of tall towers), the impact is rated adverse but not significant (Class III). While it is acknowledged that visual analysis is necessarily an inexact, subjective process, the preparers of the Draft EIR have attempted to establish rational criteria that introduce as much objectivity as possible into the analysis. These criteria are discussed in Section C.12.1.2 of the Draft EIR. It will be up to the decision-makers to determine whether or not they concur with the analysis presented in the EIR.

Although there would be construction and post-construction impacts related to disruption of grape production, described and mitigated (Mitigation Measures L-22 and L-23) in Section C.7.6.3, there would be a net increase in the availability of acreage for grape production under the Stanislaus Corridor Alternative.

- A-18 The City's opposition to any alternative with features within the (recently expanded) Sycamore Grove Regional Park boundaries is acknowledged. In response to such concerns, a modification of Alternative S2A and the siting for Switching Station 2 (a Phase 2 Alternative) has been developed (see Final EIR Sections B.2 and C.1).
- A-19 The City's interest in consolidating the Stanislaus and Tesla-Newark Transmission Corridors through the South Livermore area is acknowledged. There is no room within the existing Tesla-Newark Transmission Corridor to add a 230 kV transmission line, in the wake of the CAISO's decision to upgrade a previously-vacant "slot" therein, hence the addition of the Stanislaus Corridor Phase 2 Alternative to replace the "Tiger Creek Alternative" originally planned (see Scoping Report, July 2000). Therefore, the suggested consolidation would require the addition of at least 100 feet to the entire length of this right-of-way. That action, while it would consolidate visual impacts, would need to be evaluated for impacts to all other resource areas, especially biological and cultural resources and land use. As the City's comment notes, the Phase 2 Switching Station Alternative would obviate the need for a Phase 2 transmission corridor (either the Proposed or Stanislaus Corridor). Further, the No Project Alternative continues to be Environmentally Superior for the Phase 2 component, based on electrical system modeling jointly performed by the CAISO and PG&E Co.

# COMMENT SET B: EAST BAY REGIONAL PARKS DISTRICT (EBRPD)

- B-1 The District's position on the Proposed Project's Phase 2, and its encouragement of the CPUC's efforts to rely upon replacements or upgrades to existing facilities, is acknowledged. Responses to more detailed comments follow.
- B-2 The most recent versions of the California Natural Diversity Data Base (CNDDB) and California Native Plant Society (CNPS) Electronic Inventory, recent surveys of the Proposed Project alignment (PG&E 2000), as well as surveys by the EIR team of the proposed alignment and alternatives were used in evaluating occurrences and potential impacts to sensitive species along the proposed and alternative routes. The Draft EIR addresses potential impacts to these species. Table C.3-3 was not intended to document every occurrence of these species in the project area

Mitigation Measures B-5 and B-6, in Section C.3.3.1.1 of the Draft EIR, address the potential impacts (3.8 and 3.9) to special status plant species along the proposed and alternative alignments. The use of such avoidance mitigation measures, which prescribe pre-construction surveys for special status species to avoid impacts, by altering access routes are commonly employed when the exact location of species cannot be predicted for a future project. These mitigation measures have been changed to ensure that all species listed at the time of project construction are protected (see Final EIR Table F-1).

B-3 According to the information used to develop the Draft EIR, including the most recent version of the CNDDB, CNPS Electronic Inventory, and the CalFlora database, no additional occurrences of either of the two *Cordylanthus* species have been observed in Alameda County since 1993. While *Fritillaria agrestis* may be present at Brushy Peak, it is not federal or state listed as endangered, threatened or rare, and is on CNPS List 4 and, as stated in the Draft EIR on page C.3-17, "Plant species on CNPS Lists 3 and 4 generally do not qualify for protection under CEQA." Sections C.3.6.1 and C.3.6.2 of the Draft EIR cite the reported presence of San Joaquin saltbush (*Atriplex joaquiniana*) along the proposed alignment and the Brushy Peak Alternative Segment; although the project includes avoidance of the species, potential impacts are addressed through Mitigation Measures B-6 and B-7. Section C.3.5.4 acknowledges the unavoidable significant (unmitigable) impact to *Cordylanthus* due to potential impacts to its unique hydrological requirements south of the L1 Alternative and recommends selection of a route other than the L1 Alternative. (Note also that the Brushy Peak Alternative has been eliminated from consideration; see Final EIR Section B.6.)

The newly described species, *Deinandra bacigalupi*, had not been classified by CDFG or CNPS during development of the Draft EIR. Mitigation Measures B-6 and B-7, in section C.3.3.1.1 of the Draft EIR, address the potential impacts (3.8 and 3.9) to special status plant species along the proposed and alternative alignments. The use of such avoidance mitigation measures, which prescribe pre-construction surveys for special status species to avoid impacts, by altering access routes are commonly employed when the exact location of species cannot be predicted for a future project. These mitigation measures have been clarified in the Final EIR (Table F-1) to be applicable to any special status species with the potential to occur in the area, at the time of mitigation implementation, not limited to those shown in Draft EIR Table C.3-3.

B-4 The latest version of the CNDDB was used as one source of information to determine the special status wildlife species that could occur along the Proposed and Alternate routes. Because the CNDDB does not include all sightings of these species, the preparers also used other CDFG lists and publications ("Special Animals" CDFG Wildlife and Habitat Data

Analysis Branch, 2000; Zeiner et al. 1990). The Draft EIR's determination of potential presence (Table C.3-4) is consistent with the list of species provided in the comment as follows: San Joaquin kit fox (moderate to high potential); California tiger salamander (present); California red-legged frog (present); burrowing owl (present); golden eagles (present); loggerhead shrike (present); and longhorn fairy shrimp (moderate to high potential). Table C.3-4 was not intended to document every occurrence of these species in the project area, but the Draft EIR does address potential impacts to these species.

Based on this comment, Table C.3-4 is revised in the Final EIR as follows: under "Potential for Species Occurrence Within Project Area", Prairie falcon, replace "**Low potential**" with "**Moderate potential**".

- B-5 After receiving this comment, the EIR preparers talked with park planners regarding cultural resources documents. The referenced studies are not yet available and those known for the area do not cover the Brushy Peak Preserve. The following reports on file at the CHRIS/NWIC for the Brushy Peak area do not address resources in the preserve:
  - Love, E., M.P. Holman and D. Chavez. 1976. An Archaeological Reconnaissance of the Proposed Pipeline Routes and Reservoir Locations, Livermore-Amador Valley Water Management Agency, Alameda (S-898).
  - Bramlette, A., M. Praetzellis, A. Praetzellis, M. Purser and D.A. Fredrickson. 1990. Archaeological and Historical Resources Inventory for the Vasco Road and Utility Relocation Project, Contra Costa and Alameda Counties (S-12800).

The following references were reviewed for the Final EIR, but no changes in impacts described in the Draft EIR were required.

- Anonymous (No Author). n.d.. Concordance in Progress: Preliminary Historic Resources Inventory Contra Costa County, California 1976 to USGS base maps. Copied 1/9/84, CHRIS/NWIC, CSU Sonoma, Rohnert Park.
- Bazar, Chris. 1993. Preliminary Inventory of Historical Resources: Eastern Alameda County. Prepared for the Alameda County Planning Department. December 1993. Copy on file, Basin Research Associates, San Leandro.
- California (State of), Department of Parks and Recreation, Office of Historic Preservation. (**CAL/OHP**). 1988. Five Views: An Ethnic Sites Survey for California. State of California, The Resources Agency, Department of Parks and Recreation, Sacramento.
- Contra Costa County Historical Society **(CCCHS).** 1994. Contra Costa County Map of Historical Points of Interest: giving precise locations of 195 sites of historical.... Scale [ca. 1:96,000] (W 122016'--W 121032'/N 38007'--N 37013'). The Society, [Martinez, Calif.].
- United States Department of the Interior, National Register of Historical Places, National Park Service (**USNPS**). 2001. National Register of Historic Places Index by Property Location. Properties in California, listed determined, and pending. Copy on file, Basin Research Associates, San Leandro.

- Ziesing, Grace H. (editor). 1997. From Rancho to Reservoir: History and Archaeology of the Los Vaqueros Watershed, [Contra Costa County], California. Anthropological Studies Center, Sonoma State University Academic Foundation, Inc., Rohnert Park.
- B-6 The Draft EIR statement referenced in the comment reads: "The EBRPD intends for Laughlin Road to provide access to the Brushy Peak Regional Preserve, which is currently closed to the public." The writer believes this sentence properly conveys the meaning that Brushy Peak, not Laughlin Road, is currently closed to the public. In any event, to allay any confusion, the Draft EIR is hereby revised as follows (page C.7-13, third paragraph):

"The Phase 2 alignment veers slightly to the northwest at Milepost C7.1, then turns dues west at Milepost C7.9 and crosses Laughlin Road at Milepost B8.0, about 1,000 feet south of a former residence now owned by the East Bay Regional Park District (EBRPD) and about 800 feet north of a second residence on the east side of the roadway. The EBRPD intends for Laughlin Road to provide access to the Brushy Peak Regional Preserve, which <u>; this park is</u> currently closed to the public. Due to concerns about the visual impacts of PG&E Co.'s proposed crossing of this gateway to an important regional natural resource, an alternative to this crossing location is examined below (the Brushy Peak Alternative Segment)."

B-7 Note that as stated in Final EIR Section B.6, the Brushy Peak Alternative has been eliminated from EIR consideration due to the acquisition of this land by the Park District. The referenced information presented on page C.7-21 of the Draft EIR was provided by the East Bay Regional Park District staff in a June 26, 2000 meeting with the EIR consultants. To rectify the error and update the status of the park, in accordance with the comment, the Draft EIR is hereby revised as follows (page C.7-21, third paragraph):

"A number of EBRPD facilities are located in the project area. The Vineyard substation in Pleasanton is immediately west of Shadow Cliffs Regional Park, a 296-acre park with an 80-acre lake and a four-flume water slide. In addition, the proposed Phase 2 route passes south of Brushy Peak Regional Preserve, a 507-acre scenic open space area owned by the Livermore Area Recreation and Park District (LARPD) (see below), but and managed and operated by LARPD and the EBRPD. Currently, the Preserve may only be visited via LARPD-guided tours. The EBRPD has recently acquired two three properties immediately to the south of the Preserve, and a third property will be acquired in January 2001. These properties totaling 1,120 1,528 acres will be that have been added to the Brushy Peak Regional Preserve. The proposed Phase 2 alignment crosses these properties approximately between Mileposts B8 and B9.4. Due to concerns by the EBRPD that the proposed transmission line would cross the entrance way to the park and visually degrade the visual gateway to the Preserve and Brushy Peak, an alternative alignment (Brushy Peak Alternative) south of the planned park entrance is examined in this EIR."

B-8 The EBRPD's recent acquisition of the Dyer property, which runs to the south of the Brushy Peak Alternative, had not occurred at the time of publication of the Draft EIR. Although the EIR preparers were aware that additional properties would be acquired by the District after Draft EIR publication, and noted this on page C.7-21 of the Draft EIR, the Dyer property was not included in those anticipated properties. The Brushy Peak Alternative was developed in consultation with the EBRPD in June 2000 expressly to avoid Brushy Peak Park, and received the District's concurrence with the proposed alternative alignment at that time. It is acknowledged that conditions have changed since that time, and the Brushy Peak Alternative would no longer avoid impacts on the park. Therefore, the Brushy Peak Alternative has been eliminated from EIR consideration as explained in Final EIR Section B.6. If this alternative were retained, the following changes would have to be made to the Draft EIR (page C.7-62  $(10^{th} \text{ and } 11^{th} \text{ lines})$ :

This would be a significant impact (**Class I**), mitigable by the adoption of the Brushy Peak Alternative (Sec. C.7.6.2).

#### Mitigation Measures for Conflict with Recreational Use and EBRPD Mast Plan Policy

**Impact 7-31:** Visual intrusion on regional preserve and conflict with EBRPD policy on transmission lines (Class II).

Adoption of the Brushy Peak Alternative (Sec. C.7.6.2) would avoid this impact."

page C.7-62:

### "C.7.6.2.2 Operation and Maintenance

This alternative would avoid the Proposed Phase 2 line's have a similar significant, unavoidable (Class I) impact on the Brushy Peak Regional Preserve (the related conflict with the *EBRPD Master Plan* policy) as that identified for the Proposed Phase 2 line."

B-9 The visual analysis concluded that both the Proposed Phase 2 project (Section C.12.6.1.2) and the Brushy Peak Alternative (Section C.12.6.1.3) would result in significant, unavoidable visual impacts **(Class I)**, and that the only way to avoid these impacts would be to select another route alternative. A simulation of the Proposed Project in this area was not prepared but the reader can refer to Figure C.12-25 (Brushy Peak Alternative) for a representation of the type of visual impact that would occur along the proposed Phase 2 Route. Also, the reader can refer to the Visual Analysis Summary presented as Table C.12-6 for a comparison of the proposed Phase 2 route and the Brushy Peak Alternative. As described in Response to Comment B-8, the Brushy Peak Alternative has been eliminated from EIR consideration.

#### COMMENT SET C: CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

- C-1 No response needed; confirmation of Proposed Project description.
- C-2 No response needed; confirmation of the Draft EIR's Environmentally Superior Alternative conclusions.
- C-3 No response needed; the CAISO's studies indicate that the Draft EIR's Environmentally Superior "Build" Alternative, as well as other Draft EIR alternatives, would allow the CAISO to operate the system reliably.
- C-4 No response needed; the comment confirms that CAISO studies found the Proposed Phase 2 Project component not needed until about 2009-2011.
- C-5 See Response to Comment C-3; the CAISO adds that when the Dublin and Vineyard Substations reach their full capacity under the Environmentally Superior "Build" scenario (D1,

S2/S2A, Switching Station 2 for Phase 2), the overhead portion of the transmission line connecting these substations will need to be reconductored.

- C-6 Since the CAISO has not independently reviewed PG&E Co.'s distribution load forecasts for the North Livermore area, it can offer no additional conclusions regarding the need for the Proposed Project in this area.
- C-7 The CAISO's concerns about potential delays in the expected in-service date for the Project, given the longer underground segments reflected in the Environmentally Superior "Build" Alternative, are acknowledged, and will be given due consideration by the CPUC.
- C-8 The CPUC appreciates the CAISO's concerns regarding the potentially higher cost of the Environmentally Superior Alternative (due primarily to greater use of undergrounding), which the CAISO believes are not justified by superior reliability benefits over the Proposed Project, but as noted by the CAISO are driven by environmental, social and aesthetic factors which the CPUC is mandated to consider under CEQA.
- C-9 The CAISO concurs with the Draft EIR's conclusion that, if the Proposed Project or another "build" alternative is not constructed, service curtailment will result.

# COMMENT SET D: ALAMEDA COUNTY WATER DISTRICT

D-1 This comment addresses the important role of the Alameda County Water District (ACWD) in participating in the management of the Alameda Creek watershed. In particular, ACWD is interested in any upstream projects that could impact the Niles Cone groundwater basin downstream. The ACWD has been added as a responsible agency on the Mitigation Monitoring, Compliance, and Reporting Program table in Section F for Mitigation Measures H-2, H-3, H-4, H-5, and H-8.

#### COMMENT SET E: LIVERMORE VALLEY JOINT UNIFIED SCHOOL DISTRICT

E-1 As explained in Final EIR Section B.6, the Brushy Peak Alternative has been eliminated from consideration. However, with respect to the analysis in the Draft EIR, the Brushy Peak Alternative as depicted on Figure B-12 is slightly misrepresented, as it is shown to extend somewhat further south than would actually be the case. The alternative alignment is more accurately shown on Figure B-16. The east-west segment of the alignment would extend along the southern boundary of the former Frick property (Assessor's Parcel No. 099B-5475-004-01), recently acquired by the East Bay Regional Park District. Based on the *Vasco-Laughlin Specific Plan* area site plan, the alignment would therefore run immediately north of the Specific Plan area, but not through it. Nonetheless, the 150-foot buffer required by Section 14010(c)(2) would not be feasible between the school property as proposed and the Brushy Peak Alternative alignment. This potential conflict was not addressed in the Draft EIR because the Vasco-Laughlin Specific Plan is not an adopted planning document, and the City of Livermore did not identify it as a document that should be evaluated when the EIR consultant inquired about plans and policies applicable to the Proposed Project and alternatives.

CEQA does not require an evaluation of a Proposed Project's consistency with plans or policies that have not been officially adopted, nor does it require an evaluation of compatibility with future, speculative land uses. However, in evaluating the environmental impacts of the proposed transmission line, the CPUC has attempted to also consider reasonably foreseeable future conditions, such as adoption of the *North Livermore Specific Plan* (which has been partially derailed since publication of the Draft EIR through the passage of Measure D in Alameda County in the November 2000 election). The CPUC therefore deems it prudent to address the impact identified by the commenter. Accordingly, Section C.7.6.2.2 of the Draft EIR is hereby revised as follows page C.7-62, fifth paragraph):

"This alternative would avoid the Proposed Phase 2 line's impact on the Brushy Peak Regional Preserve (the related conflict with the *EBRPD Master Plan* policy). <u>However, it would result in the following new impact:</u>

# **Conflict with Proposed Elementary School**

The east-west leg of the Brushy Peak Alternative would be located along the northern boundary of a planned elementary school, as identified in the draft *Vasco-Laughlin Specific Plan*. State regulations require school site property lines to be set back a minimum of 150 feet from 230-kV transmission line easements. The Brushy Peak Alternative would conflict with this requirement, and could prevent the school district from constructing the school in the proposed location. This would be an adverse but mitigable impact **(Class II)**.

# Mitigation Measures for Conflict with Proposed Elementary School

**Impact 7-32A:** Encroachment on school's required setback from transmission line.

**L-22A** If selected for implementation, the alignment for the Brushy Peak Alternative should be adjusted so as to maintain a separation of 150 feet from the edge of the transmission corridor right-of-way and the planned school property."

# COMMENT SET F1: ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY, SURPLUS PROPERTY AUTHORITY

F-1 The City of Pleasanton's land use designations for the parcel referenced in the comment were not discussed in the Draft EIR because the area lies outside the City's incorporation limits; the County's designation of the site as Mixed Use was properly noted. (Please note that the City of Pleasanton was consulted regarding planning documents applicable to the project prior to commencing the EIR analysis; the Stoneridge Drive Specific Plan referenced in this comment was not identified at that time.) Among the permitted uses in the County's Mixed Use land use designation are light industrial, public, and quasi-public uses, which would seem to encompass the proposed transmission facilities. The Stoneridge Drive Specific Plan indicates that retail, service commercial, and light industrial land uses are planned along El Charro Road, which is to be widened to six to eight lanes. Specific allowable uses within these land use designations are not defined in the Specific Plan or in the City's General Plan. The Specific Plan does note that "detailed standards for commercial development, including land uses, product types, signage, roadway alignments and dimensions, and other public improvements will be required at the Planned Unit Development (PUD) stage for individual commercial projects within the Specific Plan." Thus, there is no reason at this stage of planning within the Specific Plan Area to assume that that the transmission line would not be an allowable use in that area, nor is it an inherently incompatible use. Consequently, while it is useful to more fully flesh out the planning information applicable to the area, there is no need to identify a new land use impact or conflict with the Specific Plan.

While it is true that I-580 is a County-designated Scenic Route, the scenic corridor is defined as "up to 1,000 feet from the roadway in rural areas having a high scenic quality." It is difficult

to characterize this area as either rural or possessing a high scenic value, given the future development identified in the comment. It is presumed that the Scenic Route designation of I-580 applies more appropriately to the portions not located within highly urbanized areas and with significant natural visual resources. While some stretches of I-580 meet this criterion for scenic quality, the vicinity of the D1 Alternative clearly does not. The decision-makers will consider the Scenic Route status of I-580 when determining whether or not to approve the project, Alternative D1, or another alternative to the project. However, given the context of the "scenic corridor" at this location, it is not deemed warranted to identify an Alternative D1 conflict with the County's Scenic Route Element.

- F-2 Please see Response to Comment F-1. With respect to the park, the *Stoneridge Drive Specific Plan* identifies a 17-acre community park in the planning area which at its closest point would be about 800 feet west of El Charro Road. The intervening 800 feet would be developed with light industrial and service commercial uses. The park would be bounded on the south by a four-lane arterial roadway (an extension of Stoneridge Drive). According to the Specific Plan, El Charro Road would be eight lanes wide, and a large volume of heavy-duty trucks hauling aggregate materials from the quarry area would continue to travel daily on El Charro Road. As noted in Response to Comment F-1, the park would also be dominated by traffic and noise from I-580. In this context, an overhead transmission line along El Charro Road would not be considered to substantially adversely affect the recreational experience at the community park. It should be noted that the referenced 30-acre park adjacent to El Charro Road was part of a development proposal before the City a year or two ago. That proposal was subsequently dropped, and at this point in time, the Specific Plan sets forth the official intention of the City with respect to park development plans for the Staples Ranch property.
- F-3 Please see Response to Comment F-1. The D1 Alternative crosses through primarily disturbed terrain with limited public visual access. Relatively brief views of the D1 Alternative are available from I-580 which is a rapidly developing urban transportation corridor within which existing and new commercial and residential development projects are continually reducing visual access to the north and south hills. The D1 Alternative does not block views to the southern hills and would be considerably less noticeable than the commercial centers, business parks, and residential developments that are being built in close proximity and parallel to the freeway. Although the D1 Alternative would appear to be inconsistent with I-580 scenic route designation, the D1 Alternative would constitute less of a view impairment to southerly views than most of the development projects that are currently being approved and constructed throughout the I-580 corridor including the immediate project vicinity. Therefore, the D1 Alternative's inconsistency with the I-580 corridor results in an adverse but not significant visual impact.

The referenced mitigation measure for the Proposed Project addresses the visual impact at only one location along the proposed route. In total, the Proposed Project has greater visual impacts than the D1 Alternative, most of which can only be avoided by selecting an alternative route.

- F-4 Please see Response to Comment F-1. Undergrounding of Alternative D1 south of I-580 has not been recommended as mitigation in this EIR.
- F-5 Both the Proposed Project and Alternative D1 would connect the new Dublin Substation to the Contra Costa-Newark Line (one to the east and the other to the south), so neither would provide the redundancy to which the commenter refers. Only Alternative D2, which would

connect the new Dublin Substation to the San Ramon-Pittsburg Line, to the west, would connect to a different transmission line.

# COMMENT SET F2: ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY, PLANNING DEPARTMENT

- F-6 The comments are consistent with the findings presented in the Draft EIR. The commenter's preference for Alternatives P1, P2, and P3 is acknowledged and will be considered by the CPUC prior to making a decision on whether or not to approve the Proposed Project or one of the alternatives to the project.
- F-7 Transmission lines exist over and through landfills and there are no operational safety issues associated with their presence in these locations. Methane gas is produced at landfills and for most is actually collected and flared. Methane concentrations in the air around landfills are below any level that could produce a hazard for electric power lines. By way of comparison, methane in the air at concentrations that would be of concern for a power line over 20 feet above ground would mean that concentrations near the ground would be so high that they would necessitate eliminating any public presence or vehicle presence. In short if people or cars can be in the areas where the poles would be, there would not be a hazard from the line. There can be a concern with construction of lines <u>in landfills</u> because excavation in areas with methane gas pockets could spark a fire or where there would be worker hazards in excavations with collected gas pockets.

# COMMENT SET G: LIVERMORE AREA REGIONAL PARKS DISTRICT (LARPD)

- G-1 The commenter does not state a basis for the assertion that the Draft EIR did not adequately consider impacts of the proposed alignment through North Livermore. This portion of the Proposed Project is addressed in detail in the Draft EIR. In addition to identifying a significant, unavoidable impact due to a conflict with applicable Alameda County visual protection policies (see Impact 7-23, page C.7-56 of the Draft EIR), the Draft EIR identifies impacts related to conflicts with policies contained in the draft *North Livermore Specific Plan*, as well as the adopted *North Livermore General Plan Amendment* (Impacts 7-23 through 7-25, pages C.7-56–C.7-58). The commenter has not specified any adopted policies not identified in the Draft EIR with which the Proposed Project would conflict. The District's support of the P2 and P3 Alternatives is acknowledged and will be considered by the CPUC prior to making a decision on whether or not to approve the Proposed Project or one of the alternatives to the project.
- G-2 Please see Response to Comment A-13, which addresses similar concerns by the City of Livermore.
- G-3 Contrary to the commenter's assertion that the EIR authors were unaware that LARPD is the property owner of Brushy Peak, this fact is explicitly stated on page C.7-21, where the third paragraph states that the District is the property owner. The discussion also acknowledges acquisitions by the EBRPD to expand the park, and an impact related to the visual intrusion of the project on the park is identified on pages C.7-61–C.7-62. Please also see Responses to Comments B-7 and B-8 in which the elimination of the Brushy Peak Alternative is described.
- G-4 The CPUC believes that the impacts associated with the Proposed Phase 2 transmission line, particularly through the Brushy Peak Regional Preserve, have been adequately addressed under CEQA. The potential for significant impacts by this component of the Proposed Project is

reflected in the development of two complete alternatives to this alignment in South Livermore (the Stanislaus Corridor Alternative and the Switching Station Alternative), and the Draft EIR's finding the Switching Station Alternative to be Environmentally Superior.

- G-5 The Draft EIR acknowledges the issues raised in the comment, identifies an impact of the S1/S2/L2 Alternatives on Sycamore Grove Regional Park and the SLVALT conservation easements on pages C.7-46 through C.7-47 (Impact 7-9), and recommends measures to reduce the impact to a less-than-significant level (Mitigation Measures L-6, L-7, and L-8). Related visual impacts are addressed and mitigated in Sections C.12.3.2.1 and C.12.3.2.2 of the Draft EIR. A range of general impacts to biological resources are identified in Section C.3.2 and extensive measures to mitigate the impacts are recommended. Regarding the LARPD regional trail and the Scenic Route designation of Isabel Avenue, please see General Response GR-4 and Response to Comment A-3.
- G-6 The Draft EIR states in Section C.7-50 that the impacts identified for Alternative S1 (with nonapplicable exceptions noted) would apply equally to Alternative S2. As noted in Response to Comment G-5, the alternative's impacts on the park are identified and mitigated with the development of the S2A Alternative, which has been re-configured (as described in Final EIR Sections B and C) to minimize impacts on park lands. The District's support of the Proposed Project and opposition to Alternatives S2 and S2A is acknowledged and will be considered by the CPUC prior to making a decision on whether or not to approve the Proposed Project or one of the alternatives to the project.
- G-7 The location of Switching Station Site 3 is northwest of the Tiger Salamander Mitigation Pond. As described in Section C.13.1.3, Switching Station Site 3 would be sited southwest of the tap point of the S1/S2/L2 Alternatives, between the existing Stanislaus Transmission Line to the north and the Contra Costa-Newark Transmission Line to the south, immediately adjacent to an existing multi-use trail. Figures B-18 and C.13-a in the Draft EIR provide an approximate location of the switching station, whereas Figure C.13-3 shows a more precise location of Switching Station Site 3. Potential impacts on Tiger Salamanders and Red-legged Frogs due to construction of Switching Station 3 are addressed on page C.13-14. Implementation of Mitigation Measure B-9 (delineation of critical habitat; consultation with USFWS) would reduce impacts to Red-legged Frogs to less than significant. Implementation of Applicant Proposed Measure 7.7, which details survey and protection requirements that would eliminate potentially significant impacts to Tiger Salamanders. In any event, Switching Station Site 3 was not found to be environmentally preferred in the Draft EIR, a conclusion which has not changed in the Final EIR.
- G-8 The location of Switching Station Site 2 was addressed in Section C.13 of the Draft EIR, but this station has been relocated in the Final EIR as described in Section B.2. Potential impacts on Tiger Salamanders and Red-legged Frogs due to construction of Switching Station 2 are addressed on page C.13-11 and also apply to the new site. Implementation of Mitigation Measure B-9 (delineation of critical habitat; consultation with USFWS) would reduce impacts to Red-legged Frogs to less than significant. Implementation of Applicant Proposed Measure 7.7, which details survey and protection requirements would eliminate potentially significant impacts to Tiger Salamanders.

The location of the S2A Alternative is shown in the Draft EIR on Figure B-18 (in Project Description and Alternatives Section) and Figure C.13a (not Figure C.13-1 as erroneously

referenced in Section C.13.3.2), although the relatively poor quality of these figures is acknowledged. It is also described in Section C.13.3.2 text, as is the impact analysis.

A modification of Alternative S2A and the siting for the Switching Station 2/Phase 2 Alternative has been developed to take them completely out of the (recently expanded) Park, as described in Final EIR Section B.2.

- G-9 Please see Response to Comment A-18, which addresses similar comments by the City of Livermore.
- G-10 Please see Response to Comment A-18, which addresses similar comments by the City of Livermore.
- G-11 The District's position on the Stanislaus Corridor Alternative is acknowledged. See also Response to Comment A-19.

#### COMMENT SET H: SOUTH LIVERMORE VALLEY AGRICULTURAL LAND TRUST

- H-1 No response needed, confirming information about the Trust and its interests in Sycamore Grove Regional Park is appreciated.
- H-2 The Trust's support of an S2A Alternative around the park (and continuing to be underground) is acknowledged.
- H-3 The Trust's concern about further degradation of scenic values in the Vineyard Avenue-Vallecitos corridor is acknowledged.

#### COMMENT SET I: DUBLIN SAN RAMON SERVICES

- I-1 Mitigation Measure L-24 has been added to the Final EIR (see Table F-1) to ensure that PG&E Co. coordinates with proponents of projects that are under construction at the same time as the Proposed Project (or selected alternative) is constructed.
- I-2 As described in Draft EIR Section B.6, the EIR evaluated numerous alternatives for CEQA review. It is not feasible to complete final and detailed design for each alternative prior to the selection of the adopted route by the CPUC. For construction of underground transmission lines, PG&E will utilize the Underground Service Alert system where existing underground utilities are marked prior to construction. In addition, as explained in Response to Comment I-1, implementation of Mitigation Measure L-24 will help to minimize impacts of concurrent construction projects.
- I-3 In Table E.3-1 of the Draft EIR is not intended to show <u>existing</u> facilities, only proposed (but not yet constructed) facilities. Site number 15 is identified as the Dublin Ranch Development Project, an approximately 1,333-acre residential and commercial development. While some portions of this development have been completed (residential areas north of the substation area), the development (or infrastructure) around the D1 Alternative Substation has not yet been constructed. Figure E.3-1 of the Draft EIR identifies site number 15 to be in the vicinity of the D1 Substation Alternative site. This information was provided to Aspen Environmental Group in a letter, dated August 16, 2000, from Mr. Dennis H. Carrington, Senior Planner/Zoning Administrator, of the City of Dublin.

I-4 The District's comments on the Draft EIR are appreciated.

# COMMENT SET J: CITY IF DUBLIN

- J-1 The City's detailed comments are addressed in the following responses, and in other responses, particularly to similar PG&E Co. comments. For example, Response to Comment 123-15 provides a good overview and context for the Draft EIR's assessment of the Proposed Project's Dublin component and the D1 Alternative.
- J-2 The D1 Substation would be located on the south side of the Dublin Ranch project area in a proposed commercial area adjacent to I-580. It is anticipated that adjacent commercial and office buildings would screen the substation site from view from the residential, park, and open space areas to the north. The substation site would also be minimally noticeable from Fallon Road given its one-half mile distance from Fallon Road and the north-south directions of travel Motorists traveling south on Fallon Road would concentrate their and view orientation. viewing attention on the roadway and approaching interchange with I-580. Motorists traveling north on Fallon Road would typically find their viewing attention on the hills to the north. The substation may be visible to motorists on I-580 depending on the final development plan. However, the substation is not anticipated to be prominent in views from I-580 given the relatively high rates of speed on I-580, the relatively brief view duration that will be available to motorists, and the structural context within which the substation would be situated. It is most probable that the substation would be backdropped by other structures and may even be partially screened from view by other structures. The substation would be of similar size or smaller than surrounding buildings and thus, would appear co-dominant to subordinate with respect to its relationship with adjacent and surrounding structures of greater mass. There would also be opportunities to provide architectural treatments and landscaping to help the substation blend more effectively with surrounding buildings. Viewers from office and commercial buildings are not considered highly sensitive to visual changes since the focus of their occupancy and attention is internal to the building.

The comment's reference to Applicant Proposed Measure 6.7 is incorrect. The discussion of the South Dublin Substation (Section C.12.4.2.1) refers to Applicant Proposed Measure 6.6 which is a generic lighting and fencing measure and is appropriate for all substation alternatives. Also, with regard to the Eastern Dublin Scenic Corridor Polices intended to maintain views of visually significant ridgelands, the D1 Substation would not extend vertically high enough to impair sightlines to the ridgelands to the north. Additionally, the substation would be substantially less prominent then the adjacent development in Dublin Ranch, it would impair views of the north hills less than the surrounding development, and it would be backdropped by other development in the Dublin Ranch Project. The South Dublin Substation would result in an adverse but not significant visual impacts on I-580 and Fallon Road.

- J-3 While the proposed Dublin Substation would not be visible to the general public, the associated transmission line, extending from the substation east to the North Livermore Substation would be visible to residences and motorists on local roads. The Proposed Project would effectively result in the proliferation of utility facilities across rural open space and agricultural landscapes. Also, see Responses to Comments F-3 and J-2.
- J-4 The Draft EIR did develop mitigation measures to try to address the significant visual impacts associated with the new transmission line that would have to be constructed across North Livermore and through the open, rolling hills to the Proposed Dublin Substation site; see Section C.12.5.1.

J-5 The area around the gravel pits along the haul road south of El Charro Road consists of "a complex of alluvial, fluvial and floodplain deposits of gravel, sand, silt and clay." (Draft EIR, Section C.5.1.2, page C.5-5) These deposits are generally unconsolidated, but are only significantly "seismically unstable" if they liquefy. The density, coarse nature of the granular deposits and the depth to the groundwater table that intersects the ground surface within the gravel pits, generally limit the liquefaction potential of these sediments. These deposits exhibit a potential for seismically induced lateral spreading, but only where steep incisions into the deposits occur, either from stream incision or human-related activities such as gravel mining operations. The seismic stability of the gravel pit walls would be the primary concern after aggregate mineral extraction activities had been completed in the area. The potential for seismically induced lateral spreading of the gravel pit walls would be reduced by the lowering of the water table induced by the creation of the gravel pits.

Construction of the overhead transmission line support towers would not require piers drilled to bedrock. Deep foundations would only be required in order to maximize the amount of aggregate reserves that could be extracted around the tower footings when the surrounding area is mined for aggregate. The extent of this buffer zone of aggregate materials will depend on the foundation design chosen by the Applicant, and approved by the local planning agencies, however, it is reasonable that the deeper foundations will be chosen to partially reduce the cost of the aggregate reserves lost. The loss of aggregate reserves would be reimbursed to the mineral rights holders as part of the compensation for acquisition of the utility right of way.

J-6 The only potentially significant geology or soils impacts identified in the Draft EIR for the Proposed Project or <u>any</u> of the alternatives were Surface Fault Rupture (Impact 5-6), for the D2 and L2 Alternatives (addressed by Mitigation Measure G-2), Strong Ground Shaking (Impact 5-7) for all aboveground structures, including PG&E Co.'s Proposed Project (addressed by PG&E Co.'s Measure 13.11) and Seismic Dam Failure (hazard of seismic failure of the Del Valle Dam), which could affect crossings and parallels of Arroyo Valle in the Proposed Project or Alternatives (which do no not exist for the Dublin components of the Proposed Project or Alternatives) (see Draft EIR Section C.5.3).

The commenter fails to note the marked difference between the Proposed Project's Dublin Substation and Alternative D1 (South Dublin Substation) in regards to Hydrology and Water Quality (Draft EIR Section C.6.4). The following excerpt from the Draft EIR summarizes this difference well:

Unlike the proposed Dublin Substation, the South Dublin site is not adjacent to a creek or arroyo. In contrast to the proposed Dublin Substation, a significant degree of earth moving work (beyond basic grading) would not be required at the South Dublin Substation site to prepare the site for substation construction. These two important differences in the geomorphic settings of the proposed Dublin and South Dublin substation sites explain most of the differences in the magnitude of the hydrologic impacts between the two stations. (Draft EIR at pp. C.6-40 to -41)

In fact, the Draft EIR found a significant, unavoidable **(Class I)** impact for the Proposed Project's Dublin Substation due to increased runoff and erosion, due to the replacement of a grassy slope cover with a more impermeable surface which includes gravel, concrete and pavement. As explained in the Draft EIR (Section C.6.4.1.2):

The significance of this impact of increased runoff from the Proposed substation site is compounded by the currently degraded condition of the adjacent tributary channel ... which is incised roughly 20 feet... (T)his stream incision is most likely a historic product of grazing, soil compaction, and the reduction and conversion of grass cover. Other things being equal, higher stormflow peak rates from the Proposed Substation on the adjacent bluff would likely exacerbate the channel incision problem." (Draft EIR at pp. C.6-39 to -40)

- J-7 It is not only the potential impacts to the federal listed and candidate animal species along PG&E Co.'s proposed alignment in the Dublin Area that make it inferior to Alternative D1, but also the length of the alignment (4 miles for the Proposed Route vs. 2.5 miles for the D1 Route). While these impacts would not be significant or unavoidable with implementation of proposed mitigation measures, an alignment that avoids impacts to sensitive species is superior to an alignment which may impact them, even if the impact is not considered significant.
- J-8 The S1 and S2 Alternatives do not include the construction of a 5-acre substation site within Sycamore Grove Regional Park; rather, a 1-acre switching site was proposed in the Draft EIR to be located in the park as an alternative to the Phase 2 Tesla connection. The S1/S2/L2 Alternatives would include an overhead transmission line through the park, but no other facilities. Impacts of the alignment through the park are addressed in Sections C.3.3.2, C.7.3.2, and C.12.3.2 of the Draft EIR. The Arroyo Substation was a component of two alternatives described in Sections B.5.4.1.3 and B.5.4.1.4, respectively, of the Draft EIR. As discussed therein, these alternatives were considered during the initial stages of preparation of the Draft EIR, but were subsequently eliminated from further consideration.
- J-9 First, a switching station is not "required for the East Vineyard and Isabel-Stanley routes" (the S2 and S1 Alternatives, respectively), as stated in this comment. The Switching Station referred to is an alternative to PG&E Co.'s Proposed Phase 2 component (a 10-mile overhead transmission line connecting Tesla Substation to the Proposed Project's Phase 1 overhead transmission line in North Livermore). In fact, as a result of studies conducted jointly by the CAISO and PG&E Co., Phase 2 does not appear to be needed until about 2009-2011; see Comment C-4 (letter from the CAISO).

Secondly, the City of Livermore, Livermore Area Recreation and Park District, and South Livermore Valley Land Trust have raised similar concerns about the siting of the Phase 2 Switching Station and S2/S2A Alternative facilities in Sycamore Grove Regional Park, and modifications to these alternatives have been made in response. Please see Final EIR Section B.2.

- J-10 The mapping of the Sycamore Grove Regional Park has been enhanced, as suggested. Please see Figure B-2 of this document.
- J-11 The City's opinion is acknowledged. Please see Part D, Comparison of Alternatives, in the Final EIR for the CPUC's conclusions regarding the Environmentally Superior Alternative.
- J-12 The City's General Plan and the *Eastern Dublin Specific Plan* were reviewed to identify land use designations and/or policies with which Alternative D1 could potentially conflict. No such conflicts were identified, other than the impact related to visual compatibility conservatively identified in Section C.7.4.2 of the Draft EIR. Nothing in the General Plan or the Specific Plan identify a substation as an incompatible or unpermitted use. Contrary to the assertion that

the substation is not compatible with the applicable zoning for the site, the City's zoning code identifies limited light manufacturing, assembly, warehousing, and distribution activities as permitted uses, and public/quasi-public facilities as conditionally permitted uses, in the Planned Development zoning for Campus Office uses. A screened or enclosed substation would be no more incompatible with the planned office/commercial uses than these permitted uses, and would have the advantage of generating almost no traffic, quite unlike those other uses. The exact location of the D1 substation has not been determined, and it could easily be located so as to be invisible from the residential uses planned to the north of Dublin Boulevard. With respect to the referenced park and open space uses with which the substation would supposedly conflict, as currently planned, these land uses would be well separated from the substation site by intervening development, and would have no effect whatsoever on those uses.

Table D.5-2 of the Draft EIR does not say the D1 substation would be incompatible with adopted scenic corridor policies. See Response to Comment F-1 for additional discussion on I-580's designation as a Scenic Route. While Table D.5-2 does say the substation would be incompatible with the planned surrounding office, commercial, and residential uses, this statement is a brief summary of the impact described in more detail in Section C.7.4.2. That discussion makes clear that the *potential* incompatibility relates to a visual compatibility, and not to any inherent land use or planning incompatibility. The discussion notes that final siting and design have yet to be determined, and that the substation could be sited/designed so as to avoid the visual conflicts with neighboring uses. Easily implementable mitigation has been recommended for this potential impact to ensure that it is no more than a less-than-significant impact. While it is clear that the commenter does not wish for the D1 substation to be located in East Dublin, she has provided no legitimate environmental or planning basis for excluding it.

- J-13 The comment indicates that the D1 substation location would displace commercial development, adversely affecting the City of Dublin. Please see Response to Comment 123-15 to PG&E Co.'s similar concerns. As stated therein, there is no construction currently underway in the area of the D1 Substation Alternative. There is an approved plan for the area, which calls for commercial/industrial land uses in the area of the substation. The substation is located in a parcel of land surrounded by (future) Dublin Boulevard on the north, Fallon Road on the east, I-580 on the south, and Tassajara Road on the west. The five-acre substation would occupy only about 0.15 percent of the area of the Eastern Dublin Specific Plan. The loss of five acres of this land for a substation to serve the high-electricity demand buildings proposed for this area ("Digital Dublin" in recent San Francisco Chronicle articles) is not a heavy burden for the area to bear. In fact, as referenced in the comments of Peter Oswald, Senior Vice President of Sunset Development Company, which owns and manages the Bishop Ranch Business Park in San Ramon (adjacent to the I-680 freeway), the presence of electric service infrastructure within a business park can be used to marketing advantage in attracting tenants who need a reliable electric power supply for their businesses (see Response to Comment PPH-154). Mr. Oswald observed that the majority of the Bishop Ranch tenants are in the telecommunications, engineering and computer software industries, and that over the years, Bishop Ranch has experienced an increase in electrical usage per employee - understandable given the increasing use of technology to boost productivity and enable global business networks.
- J-14 Although the *Eastern Dublin Specific Plan* calls for a balanced mixed-use community, with residential and employment uses balanced to provide future residents an opportunity to live and work within the community, it does not specify a targeted jobs-housing mix. Furthermore, the Specific Plan acknowledges that land uses within the plan area are generalized, and that adjustments may be necessary in response to individual development proposals. The Specific

Plan provides this generalized planning framework for an area encompassing 3,301.5 acres. A 5-acre substation would represent about 0.15 percent of this total land area, which is undoubtedly far less than the acreage that would be affected by boundary adjustments and changes in response to changing real-world conditions that the Specific Plan recognizes are an inherent part of the long-term planning process. Therefore, the assertion that the 5-acre D1 substation site would upset the jobs-housing balance achieved by the Specific Plan is specious argument.

- J-15 The Draft EIR has noted the contrast in potential land use impacts between the Proposed Project's Dublin Substation and transmission line component and the D1 Alternative (see Sections C.7.4 and D.3.3). However, as referenced in previous Responses to Comments (J-6, J-7, J-13), there are many impacts other than Land Use which "tipped" the balance in favor of Alternative D1 emerging as the Environmentally Superior Alternative. Most prominent of these is that while the Proposed Dublin Substation is not visible to the public and is located in an area zoned for low-density residential development, in order to reach this substation site via PG&E Co.'s Proposed Route, a new 230 kV transmission line would have to be constructed across North Livermore and through the open, rolling hills to reach the proposed Dublin substation site. This transmission line would create significant, unavoidable and permanent visual impacts (as identified in Draft EIR Section C.12.5, which evaluates the visual impacts of this transmission line segment). In weighing the relative impact of siting a substation in five acres of a commercially-zoned area which will have comparable infrastructure and provides the opportunity to site and design the substation in the least obtrusive manner possible, versus the permanence of the 100-foot tall transmission line towers across several miles of the heretofore unmarked North Valley, the CPUC continues to consider the latter impact to be the more severe.
- J-16 Project cost and need (e.g., in-service date) are issues which the CPUC will consider, weigh with other information such as the Final EIR, and determine in its General Proceeding for PG&E Co.'s application to construct the Proposed Project. These are not environmental impact issues under CEQA.
- J-17 See Response to Comment J-16.
- J-18 The commenter's reference to a "free and clear separate line to Dublin and other northern service areas, thus resulting in less opportunity for underground failure" is unclear. PG&E Co.'s Proposed Project would connect the Proposed Dublin Substation to the same transmission line as will Alternative D1 (the Contra Costa-Newark Line), just in different locations. Also, there is less undergrounding proposed in Alternative D1 than in PG&E Co.'s Proposed Project in the Pleasanton Area; whatever concerns are raised with respect to Alternative D1 should also be raised for PG&E Co.'s Proposed Project. Secondly, as discussed in Response to Comment J-21, one of the purposes and expected results of PG&E Co.'s Proposed Project, as well as the EIR "build" alternatives, is to offload demand from the existing San Ramon Substation in order for it to serve increasing local load (e.g., Dougherty Valley); it will also serve to relieve the existing Las Positas Substation in Livermore.

Finally, as stated in Response to Comment J-16, project cost and need (e.g., in-service date) will be addressed by the CPUC in its General Proceeding. It is hoped that given the City's expressed concerns and interests in having additional electrical capacity operational by 2002, it will lend its influence and support toward accomplishing that objective in the context of the decision ultimately reached by the CPUC.

- J-19 Regarding concerns about site/right-of-way acquisition, please see the last paragraph in Response to Comment J-18. Regarding the bore under I-580 required by Alternative D1, CalTrans regularly issues permits for perpendicular crossings of its rights-of-way, both overhead and underground, and this crossing presents no unusually challenging issues, as reflected in CalTrans' comment letter (see Comment Set M herein).
- J-20 Regarding concerns about site/right-of-way acquisition, please see the last paragraph in Response to Comment J-18. Also, it bears noting that property owners and local jurisdictions affected by PG&E Co.'s Proposed Project have also gone on record as opposing PG&E Co.'s proposed route (e.g., the Lin Family, the Foley Ranches, the City of Pleasanton and the Kottinger Ranch Homeowners Association in the Pleasanton area), which is not within PG&E Co.'s existing easement. Unfortunately, it appears that regardless of which route is ultimately approved by the CPUC, it is quite possible that one or more property owners and/or local jurisdictions may continue to oppose construction. And as reflected in Responses to Comments J-6 and J-7, the Proposed Project's Dublin Substation site and associated transmission line raise other issues which will likely entail complex and/or lengthy additional permitting associated with threatened and endangered species, erosion and sedimentation.
- J-21 As also addressed in Response to Comment 123-15, there appears to be a mistaken assumption that the Dublin Substation must also be able to serve significant new development in the Tassajara and Dougherty Valley areas, which are four to ten miles to the north of the D1 Substation site. First, no development is currently planned for the Tassajara Valley due to the withdrawal of earlier development plans. While the development in the Dougherty Valley area is currently taking place, this area is within two miles of PG&E Co.'s San Ramon Substation which could easily (and most logically) serve that area. The San Ramon Substation is now heavily loaded, but with the removal of service to the Vineyard Substation from this load (as a result of the Proposed Project, an explicit objective thereof), the San Ramon Substation will have the capacity to serve more local load such as that in the Dougherty Valley. In terms of the operational efficiency to which this comment alludes, it bears noting that Dougherty Valley development is nearly four miles west of PG&E Co.'s Proposed Dublin Substation, and within two miles of the existing San Ramon Substation.
- J-22 It is hoped that the foregoing responses, as well as clarifications which have been made in the Final EIR as a result of helpful agency input such as the City's, help the City to better understand the CPUC's conclusions regarding the Environmentally Superior Alternative, particularly in the Dublin area.

# COMMENT SET K: ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

- K-1 Zone 7's concerns regarding the siting of Alternative S2A within or adjacent to its Del Valle Water Treatment Plant property and/or access road thereto is acknowledged. In response to such concerns, a modification of Alternative S2A and the siting for the Switching Station 2/Phase 2 Alternative has been developed and is presented in Final EIR Section B.2.
- K-2 See Response to Comment K-1.
- K-3 See Response to Comment K-1.
- K-4 In response to the commenter's objection, Mitigation Measure L-7 is revised as follows:

page C.7-47, fourth paragraph:

- **L-7** PG&E Co. shall remove the existing 60-kV transmission line that crosses the park on the same approximate alignment as the S1 alignment. If this isn't feasible, the 230-kV alignment through the park shall be placed underground or the tap point and transmission line shall be aligned along the access road to the Zone 7 Water Treatment Plant located in an alternative alignment outside the park.
- K-5 The dirt road referenced in the comment is not located on Zone 7 property.
- K-6 Please see Responses to Comments K-1 and K-5.
- K-7 The referenced discussion on page C.7-25 pertains to Alameda County General Plan land use designations, not existing land uses or ownership. All of the applicable County land use designations along the S1 Alternative have been identified in the Draft EIR. Zone 7's ownership of the Del Valle Water Treatment Plant and the road leading to the plant is hereby acknowledged.
- K-8 Please see Response to Comment K-1. Also, Applicant Proposed Measure 13.3 is designed to reduce potential impacts associated with slope instability and unstable soil conditions to a level that would be less than significant (see Table C.5-2 on page C.5-25 of the Draft EIR). This measure requires a design level, geotechnical investigation be performed to evaluate subsurface conditions, identify potential hazards, and provide information for development of excavation plans and procedures to limit ground deformation. Finally, with regard to potential road failure, pursuant to Mitigation Measure T-4 (see page C.11-20 of the Draft EIR), PG&E Co. is required to ensure the long-term protection of all road surfaces disturbed by construction activities or construction vehicles by coordinating repairs with the affected public agencies to ensure that impacts to area roads are adequately repaired.
- K-9 The CPUC appreciates Zone 7's intent to make use of Mitigation Measure S-1, relative to placing underground electrical conduit adjacent to its pipelines.
- K-10 Please see Responses to Comments K-1 and PPH-70.
- K-11 Please refer to the second paragraph of Response to Comment PPH-70.
- K-12 Please see Response to Comment K-1. Also, Mitigation Measures L-1 and L-2 are intended to avoid and minimize any disruptions by construction to adjacent residents and property owners (see Draft EIR pp. C.7-42 to -43), and Mitigation Measure S-1, referenced in Zone 7's Comment K-9, also requires PG&E Co. to consult with local jurisdictions and agencies responsible for all underground utilities in order to define the exact placement of the underground transmission line.
- K-13 Please see Response to Comment K-1.
- K-14 Mitigation Measure S-1, referenced in Zone 7's Comment K-9, also requires PG&E Co. to consult with local jurisdictions and agencies responsible for all underground utilities in order to define the exact placement of the underground transmission line.
- K-15 As also referenced in Response to Comment M-1, new Mitigation Measure L-24 (in the Final EIR Table F-1) is intended to ensure coordination by PG&E Co. with other projects and plans affected by the Tri-Valley Project, whichever alternative scenario is ultimately implemented.
- K-16 The Draft EIR acknowledges the planned Chain of Lakes on page C.7-21 of the Draft EIR, and on page C.7-23 in a discussion of the *Livermore-Amador Valley Quarry Reclamation Plan*, among other places in the document.
- K-17 The commenter's point is acknowledged. In reviewing the *Livermore-Amador Valley Quarry Reclamation Plan* during the analysis performed for the Draft EIR, no conflicts with that plan were identified. The CPUC recognizes that as planning for this area proceeds, conflicts with Alternative D1 may arise that were not apparent at the time the Draft EIR was prepared. CEQA does not require an evaluation of future impacts with land uses not in existence at the time the Notice of Preparation is issued. PG&E Co. is obliged to respond to changing development conditions on a regular basis, and often has to relocate facilities to accommodate new development. If Alternative D1 is selected for implementation, PG&E Co. will respond accordingly to changing conditions in the quarry area.
- K-18 The comments are acknowledged, and PG&E Co. will coordinate any potential transmission line development in the quarry area with Zone 7. It is not anticipated at this time that Alternative D1, were it selected for implementation, would conflict with the required setbacks or access roads around the lakes, nor with a relocation of Arroyo Mocho.
- K-19 See Response to Comments K-14, K-15 and K-17 (as the same reasoning would apply to future developments in the vicinity of Alternatives S1 and S2).
- K-20 The proposed revisions of Comment K-20 are accepted such that Mitigation Measures H-7 and H-12 shall be revised to include "that the final depth of the horizontal dry drills under the two designated arroyos shall be set so that the waterways now and in the future are not impacted and that possible future channel bed improvements are not precluded." Mitigation Measures H-7 and H-12 shall also include contacting Zone 7's Flood Control Engineering Department to record and review original channel conditions and subsequent surveys, as well as, to receive encroachment permits.
- K-21 This comment regarding jurisdiction and operation of the Del Valle Reservoir is accepted such that the text describing the reservoir on page C.6-11 of the Draft EIR shall be revised to include: "The reservoir is owned and operated by the California Department of Water Resources (DWR), and Zone 7 receives water from the reservoir through its water supply contract with DWR. Local runoff is stored in this reservoir and Zone 7, through a separate operating contract with DWR, develops a current annual average local surface water yield of around 7,000 acre-feet per year."
- K-22 See Response to Comment K-1.
- K-23 These Zone 7 conditions were incorporated into Mitigation Measure S-3 (at Section C.13.3.2 in the Draft EIR).

# COMMENT SET L: PLEASANTON UNIFIED SCHOOL DISTRICT

L-1 For clarification, the transmission line route to which the District's comment refers is the S2 Alternative, not PG&E Co.'s Proposed Project, as shown in several figures in the Draft EIR,

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including Figure ES-1 and Figure B-13. This is one of three "build" alternatives evaluated in the Draft EIR along with PG&E Co.'s Proposed Project route through the Kottinger Ranch development and along Bernal Avenue.

As referenced in Response to Comment 123-69, the Draft EIR identified the potential impacts associated with construction of Alternative S2 if the elementary school included in the Vineyard Avenue Corridor Specific Plan is occupied at the time construction is undertaken (see Draft EIR Section C.7.3.3, Impact 7-16). To mitigate these potential construction noise, dust and odor impacts, the Draft EIR proposed Mitigation Measure L-12, requiring construction to be timed to occur during school breaks, such as summer vacation, Christmas break and Spring break. Also relevant are Mitigation Measures T-1 through T-8, which were proposed to reduce potential transportation and traffic impacts of Vineyard Avenue construction (see Draft EIR Section C.11.3.4). Note also that the Final EIR considers the use of New Vineyard Avenue rather than the existing roadway in order to minimize impacts to the school and other land uses (see Final EIR Section B.3).

Please also see Response to Comment 54-12.

# COMMENT SET M: CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

- M-1 The coordination with other proposed/planned projects cited in the comment is referenced throughout Section E.4.10 (Cumulative Impact Analysis for Traffic and Transportation). In order to ensure monitoring of such coordination, it has been specified in new Mitigation Measure L-24 in Final EIR Section F.1.
- M-2 Draft EIR Section C.11.4.2, page C.11-28, acknowledges the I-580 interchange projects referenced in this comment, and that PG&E Co. will coordinate with the City of Dublin regarding the D1 Alternative. Additional Caltrans and City of Dublin projects proposed or under construction will be addressed in the required encroachment permits and other applicable laws, regulations and standards. PG&E Co. will coordinate plans with all appropriate municipalities and agencies. The CPUC appreciates Caltrans' confirming detail regarding the I-580 development plans which could affect Alternative D1; these details have been added to Section C.11.4.2, and the suggested consultation with the City of Dublin on the I-580 interchange projects, as well as with Caltrans on the possible future widening of I-580 referenced in the comment, has been specified in new Mitigation Measure T-13 (see Table F-1 of Section F.3), to ensure that there are no significant impacts.
- M-3 The CPUC appreciates Caltrans' confirming detail regarding plans for the Isabel/I-580 interchange and a BART station nearby relative to Alternative L2. The former is referenced in Draft EIR Section C.11.5.5 and the latter will be added, along with new Mitigation Measure T-14 (see Table F-1 of Section F.3) to ensure consultation with Caltrans, the City of Livermore and BART should this alternative be adopted/implemented. Note that the Draft EIR characterizes Alternative L2 as "increase(ing) the significant adverse transportation impacts of the Proposed Project segment, and would not have any transportation advantages." (Draft EIR Section C.11.5.5 at p. C.11-30)
- M-4 The CPUC appreciates Caltrans' confirming detail regarding plans for the SR 84 expansion relative to Alternative S1 (and L2). This project is referenced in Draft EIR Section C.11.3.2, and Mitigation Measure T-10 therein requires coordination with Caltrans as part of the encroachment permit process.

- M-5 Caltrans' policy to exclude utilities from within access controlled rights of way for freeways and expressways is acknowledged, and was reflected in the Draft EIR based on previous experience.
- M-6 Draft EIR Section C.11.1.2, pages C.11-14 and 15 describe the Traffic Management Plan (TMP) requirements for all project actions by PG&E Co.. Mitigation Measure T-3 (at Draft EIR p. C.11-19) further specifies requirements for Traffic Control Plans.
- M-7 The time required to string cables across SR 84 was estimated by PG&E Co., based on extensive experience with this procedure. The estimate, however, did not include the preparation and staging time adjacent to the roadway which will be necessary prior to the cable stringing action, nor the demobilization adjacent to the roadway afterwards. PG&E Co. will provide detailed requirements regarding temporary road closures related to cable stringing, as part of the encroachment permit required by Caltrans. The Draft EIR at pages C.11-18 and 19 (Impact 11-1) describe proposed mitigation measures (T-1, T-2 and T-3) for temporary road closures.
- M-8 Please see Response to Comment A-3.

## COMMENT SET N: CITY OF SAN RAMON

- N-1 The City's support for the need for the Tri-Valley 2002 Capacity Increase Project and PG&E Co.'s Proposed Project is acknowledged.
- N-2 The City's opposition to Alternative D2 and acknowledgement of the Draft EIR's comparison of alternatives for the Dublin-San Ramon area is acknowledged.
- N-3 The City's planning policy that new development should bear its own impacts and not affect existing citizens and residents, and inference therefrom that the Tri-Valley Project should provide for new substations within the growth area, is acknowledged. Please also see General Response GR-5 and Response to Comment J-21.
- N-4 The City's confirmation of the electric system infrastructure already present within its boundaries, and its concurrence with the position of the South San Ramon Neighborhood Association (SSRNA, see also PPH-155 through -157) is acknowledged.
- N-5 The Draft EIR conclusions are consistent with the comment that the Dublin-San Ramon D2 Route Alternative has greater potential biological resource impacts than the other Draft EIR Alternatives for the Dublin/San Ramon Area. The acknowledgment of the conservation easements on Dougherty Valley open space would not alter the comparison of the D2 Alternative alignment to the Proposed Alignment and D1 Alternative in this area; in fact, it helps to ensure its designation as the least Environmentally Superior alignment (Table ES-5), as indicated in the Final EIR Section D.
- N-6 The conclusions in the Draft EIR are consistent with the comment that the Dublin-San Ramon D2 Route Alternative has greater potential biological resource impacts than the other Draft EIR Alternatives for the Dublin/San Ramon Area. The reason it was designated the least Environmentally Superior Alternative was due to the consideration of impacts to sensitive species from reconductoring along the nearly 20 miles of overhead transmission lines (Table ES-5).

- N-7 The upgrades that would be required at the San Ramon Substation in order for the substation to be compatible with the D2 Alternative would not involve new transformers or other equipment that could change the ambient noise conditions at the site.
- N-8 In response to a written request dated July 26, 2000, EIR preparers received a letter from Mr. John R. Harper Jr., Senior Civil Engineer with the City of San Ramon on August 10, 2000 identifying projects in the vicinity of one of the EIR alternative routes within the City of San Ramon. The City of San Ramon provided information on all four of the projects mentioned in the comment. The responses are as follows, and updates to Table E.3 are presented below.
  - a) The Water Tank Reservoir Renovation project is identified as Site No. 2 in Table E.3-1 of the Draft EIR.
  - b) The Larwin Pump Station was determined to be too far away to be considered a cumulative impact. According to the August 10<sup>th</sup> letter, the pump station would be located near the intersection of Mangos and Ensenada. The distance criteria used for the cumulative impacts analysis was projects within one half-mile of the Proposed Project or alternatives. The pump station location was determined to be greater than one half-mile from the D2 Alternative.
  - c) The Recycled Water System project and Contra Costa Central Sanitary District Sewer Line project were inadvertently omitted from Table E.3-1. The Draft EIR is hereby corrected to include these projects. Please see the revised portion of Table E.3-1 below, which includes only those projects in the City of San Ramon.

These two projects have been considered and no cumulative impacts are believed to exist. Site No. 2a is in the vicinity of the overhead portion of the D2 Alternative. Overhead towers would be placed every 800-1000 feet aboveground, and therefore would have no cumulative impacts on the installation of pipelines underground. Site No. 2b is located along the north side of the San Ramon Substation. If the D2 Alternative were selected, construction would only be east of the substation. In addition, with implementation of Mitigation Measure A-6 (page C.2-20 of the Draft EIR) no construction would occur within approximately one half-mile of the substation.

| Site<br>No. | Project                                      | Project Type   | Project Location   | Project Size  | Proximity   | Permitting<br>Status/Schedule  |  |  |  |  |  |
|-------------|--|--|--|---|---|--|--|--|--|--|--|
|             | CITY OF SAN RAMON                            |  |  |   |   |  |  |  |  |  |  |
| 1           | Alcosta Community<br>Park Canine<br>Facility | Park (Fenced<br>unleashed Dog Park)                          | West of Del Mar in<br>PG&E Right-of-Way  | 0.8 acre site   | Adjacent to D2<br>Reconductor (San<br>Ramon Substation) | City of San Ramon<br>approved; PG&E<br>approved/<br>construction 50% |  |  |  |  |  |
| 2           | EBMUD Reservoir<br>Tank Maintenance          | Reservoir<br>Maintenance                                     | North of Old Ranch<br>Road, East of Alcosta<br>Boulevard                           |   | Just south of D2<br>Alternative                         | Planning/Design  |  |  |  |  |  |
| <u>2a</u>   | EDMUD/DERWA<br>Recycled Water<br>System      | Recycled water<br>transmission and<br>distribution pipelines | Various locations (Iron<br>Horse Trail, Alcosta,<br>Bollinger, Dougherty,<br>etc.) | Install Main<br>and<br>distribution<br>lines in<br>Dublin, San<br>Ramon and<br>Danville | Within proximity of the D2 Alternative.                 | <u>Planning</u>  |  |  |  |  |  |

| Table E.3-1 Cumulative Projec |
|-------------------------------|
|-------------------------------|

| Site<br>No. | Project  | Project Type                   | Project Location                                  | Project Size                  | Proximity  | Permitting<br>Status/Schedule  |
|-------------|--|--------------------------------|---|-------------------------------|--|--|
| <u>2b</u>   | <u>Contra Costa</u><br><u>Central Sanitary</u><br><u>District Sewer Line</u> | Sewer transmission<br>pipeline | <u>On Estero from Alcosta</u><br><u>to Mangos</u> | <u>24" Dia.</u><br>Sewer line | <u>Within proximity of</u><br>the D2 Alternative | Under dispute with<br>City/design<br>Central Contra Costa<br>Sanitation District<br>design |

**Table E.3-1 Cumulative Projects** 

- N-9 The commenter is correct that in some cases the Draft EIR could have been more explicit in differentiating between approved development projects as compared to proposals. However, the analysis of land use and planning impacts presented in the Draft EIR remains valid (except as otherwise noted in this Final EIR). The Draft EIR identified an impact related to future trail users on a planned trail alignment identified in San Ramon's adopted *Dougherty Valley Specific Plan*, even though the area has yet to be annexed by the City. No impact to residential, commercial, or mixed-use property owners was identified because PG&E Co. owns the easement for an overhead transmission line and has notified the developers of its intentions to construct a line. Potential property buyers adjacent to the transmission corridor will have the option not to buy if they find the transmission line unduly objectionable. The visual impacts of Alternative D2 on drivers on Tassajara Road are addressed in Section C.12.4.3 of the Draft EIR.
- N-10 The City's opposition to <u>any</u> form of the D2 Alternative, including the Mitigation Measure A-5 reroute to bypass the San Ramon Substation, is acknowledged. The visual impacts of Mitigation Measure A-5 were evaluated in Draft EIR Section C.13.3.3.
- N-11 Undergrounding of the transmission line is considered where a significant visual impact is identified. The D2 Alternative crossing of Dougherty Valley would introduce additional prominent features into the landscape that would appear co-dominant with the existing developed features in the landscape. View impairment would be moderate, as would the overall severity of the visual impact. Although the visual impact would be considered adverse, it would not be significant. Therefore, undergrounding as a mitigation measure is not recommended in this case.
- N-12 See Response to Comment N-5.
- N-13 Regarding permits for construction within City limits, pursuant to state law, the CPUC preempts discretionary permitting by local jurisdictions for regulated electric utility facilities. However, PG&E Co. will be required to comply with any applicable ministerial permitting required by the City. Please note Mitigation Measure T-4 in the Draft EIR: "Roads disturbed by construction activities or construction vehicles shall be properly restored to ensure long-term protection of road surfaces." (at p. C.11-20)
- N-14 The comment is correct. Figure A-1 incorrectly identifies the 230 kV overhead transmission line running from San Ramon to Pittsburg as 115 kV. As shown on Figure A-2 of the Draft EIR, the EIR preparers were aware that the existing line from San Ramon to Pittsburg is a 230 kV overhead transmission line and it was included in the analysis.
- N-15 The City's concurrence with the Draft EIR's elimination of an alternative to serve Pleasanton via distribution lines from the San Ramon Substation or Proposed Dublin Substation (Section B.5.4.1.6) is acknowledged.

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- N-16 This comment requests that storm water drainage and spill containment capacities at the San Ramon Substation be improved in accordance with substation modifications associated with the D2 Alternative. More specifically, the comment requests that drainage and contamination shall be contained on site. Paragraph 2 of Section C.6.4.3 (p. C.6-42) of the Draft EIR addresses this issue stating that the existing Stormwater Pollution Prevention Plan (SWPPP) and SPCC Pond should be modified to accommodate any changes in discharge or contaminants associated with modifications to the substation.
- N-17 The City's detail regarding the proximity of residences to the San Ramon Substation is appreciated, and augments the environmental setting described in Section C.8.1.1.2 of the Draft EIR (at p. C.8-7) relative to noise impact analysis.
- N-18 The discussion on page C.7-10 provides a general description of the existing land uses along the D2 Alternative alignment, and makes reference to the planned development in Dougherty Valley, which would primarily be medium-density single-family residential development, with some mixed use development, within 1/4-mile of the alignment. More detailed discussions of general plan land use designations along the alignment are provided on pages C.7-28 to C.7-29 and C.7-33. A detailed discussion of the land use designations established in the *Dougherty Valley Specific Plan* was not provided because, until the property is annexed by the City of San Ramon, the area remains under the jurisdiction of Contra Costa County, and the County's general plan remains the guiding planning document.
- N-19 The daily traffic volume of 11,300 (1998) for Alcosta Boulevard in the City of Dublin is acknowledged, and augments the data in Draft EIR Table C.11-1, at pages C.11-2 to -3.
- N-20 The location of the pedestrian bridge at Mangos Drive/Ensenada Drive is to the north of Pine Valley Road and is not likely to be affected by PG&E Co. construction activities. Indirectly, construction work could create delays on Alcosta Boulevard that would affect traffic traveling north to the high school area. These delays, if they were to occur, would be short-term and would be less than significant as described in Draft EIR Section C.11.4.3.

# COMMENT SET O: CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

O-1 The Department's opposition to Alternative D2, due to impacts to Mt. Diablo State Park associated with the potential reconductoring of the San Ramon-Pittsburg Line which the Department does not consider can be effectively mitigated, is acknowledged. While the CAISO has determined that this reconductoring would probably not be necessary for the D2 Alternative to be feasible, this Alternative is still not found to be Environmentally Superior.

## COMMENT SET P1: CITY OF PLEASANTON AND KOTTINGER RANCH HOMEOWNERS ASSOCIATION

P-1 The commenters disagree with the elimination of an S1 Alternative variant involving undergrounding of the transmission line along Isabel Avenue between Vineyard and Stanley (in place of overhead line on tubular steel towers), as explained in Draft EIR Section B.5.4.1.8. As described therein, a primary reason for such elimination was potential conflict with the Highway (State Route) 84 Extension Project and CalTrans' typical prohibition of underground facilities within their ROW. Please see General Response GR-4. CalTrans' position is confirmed in its comment letter on this Draft EIR (see Comment Set M). Relevant excerpts follow:

4. The project proposes to install a transmission line 40 feet west of Isabel Avenue for Alternatives S1 and L2. Regardless of the alternative selected, the transmission line must be installed at least 40 feet outside of the *future* (ultimate) State right-of-way. A project to construct a new 6-lane expressway along Isabel Avenue bypassing downtown Livermore is fully funded and has been initiated by the Alameda County Transportation Authority and the City of Livermore. Right-of-way for this project will be deeded to Caltrans and designated as the new State Route 84 (SR 84). Construction is expected to begin within 5 years. We can provide you with a copy of the plans for this segment of the new SR 84.

5. It should be noted that Caltrans general policy with regard to freeways and expressways is to exclude utilities from within access controlled rights of way, to the extent practicable. Caltrans recognizes that freeway rights of way are a valuable commodity, and that such value to the traveling public could be seriously eroded by allowing uncontrolled access by utilities. For longitudinal encroachments, Caltrans has adopted the policy of the American Association of State Highway and Transportation Officials (AASHTO) which reads:

New Utilities will not be permitted to be installed longitudinally within the control of access lines of any freeway, except that in special cases such installations may be permitted under strictly controlled conditions. Utilities will not be allowed to be installed longitudinally within the median area." (Caltrans Draft EIR comment letter, February 15, 2001, at p. 2)

Given the availability of two other EIR Alternatives (S2, S4), it cannot be argued that undergrounding within the SR 84 right-of-way is warranted as a "special case" exception to the foregoing Caltrans policy. Further, the CPUC does not consider it necessary to further explore the prudence of locating a high-voltage underground transmission conduit at the edge of active gravel mining pits.

- P-2 The commenters disagree with the elimination of two transmission line routes through the Gravel Preserve, as explained in Draft EIR Section B.5.4.1.5. As described therein, the CPUC originally eliminated these routes based on their limiting the availability of gravel resources within the Preserve as well as posing potential safety hazards to personnel of the operating quarries, during and after construction. The route north from the Iuka Substation was also screened out due to concerns about the instability of land adjacent to the lakes at Shadow Cliffs Regional Park and visibility of the overhead line from the Park. However, the CPUC has revisited this route and has designed a route that avoids the unstable areas and minimizes visual impacts. Please see Section B.4 in the Final EIR, which describes the S5 (Quarry Route) Alternative.
- P-3 The commenters object to the absence of the "New Vineyard Avenue" in the Draft EIR's analysis of the S2 Alternative. This 1.5-mile realignment of Vineyard Avenue included in the Vineyard Avenue Corridor Specific Plan is discussed in Section C.11.3.3 of the Draft EIR, in

the impact analysis of Alternative S2 for Transportation and Traffic. Therein, the following conclusion and rationale is stated:

From a transportation perspective, it would be better for Alternative S2 to stay in the existing Vineyard Avenue right-of-way regardless of future realignment plans. The roadway realignment project is not currently scheduled and it could possibly be long after Alternative S2 were built before it got underway. An attempt to follow the proposed realigned roadway prior to it being constructed would require PG&E Co. crews and equipment to trench in an area that is about 1 mile long and between 500 to 1,000 feet north of the existing paved road. The existing segment of Vineyard Avenue scheduled for realignment would be maintained as a paved recreational path providing access for emergency and maintenance vehicles.

While the CPUC still finds the foregoing reasoning apt, it has further explored the use of the New Vineyard Avenue route as a variation of either Alternatives S2 or S4. Please see Sections B.3 and C.2 in the Final EIR.

- P-4 The CPUC regrets that the commenters consider the Proposed Project and Alternative S2 "to be the only focus of the Draft EIR's analysis", in light of the Draft EIR's considerable analysis of Alternatives S1 and S4 for the Pleasanton Area component of the Project (not to mention several other alternatives studied in the Dublin and North Livermore areas, but which are understandably not of interest to the commenters). All of the Pleasanton Alternatives (S1, S2, S4) were clearly developed to reduce the disruption of residential areas involved in the Proposed Project route in Pleasanton. Further, while the Draft EIR did not employ the precise method suggested in this comment to assess impacts on residences ("counting households along each route and identifying those routes that impact the fewest number of people"), a plain reading of the Draft EIR's Land Use and Noise sections provides ample evidence of the Draft EIR's consideration of the proximity of, and impacts to, sensitive receptors which include residences. This is also reflected in the Comparison of Alternatives (Draft EIR Section D.3.1 for the Pleasanton Area). The CPUC cannot agree that number of residents alone can dictate the determination of the Environmentally Superior Alternative; as is plain from the Draft EIR's Section D, there are many variables and trade-offs which must be considered and weighed in making a thoughtful determination.
- P-5 The CPUC does not agree that the Draft EIR lacked sufficient "route description, maps or analysis showing details that are necessary to perform an accurate environmental analysis" as alleged by the commenters. The Draft EIR includes over 35 pages of Proposed Project Description alone, which in turn underlies several hundred pages of environmental analyses in 12 impact issue areas. As the City of Pleasanton in its role as both a project proponent and permitting agency has no doubt experienced, precise, detailed construction drawings are typically not undertaken until the completion of the permitting process, for cost as well as efficient use of resources purposes. While often frustrating due to the lack of such precision and detail, the CPUC recognizes the practical limits on requiring such detailed investigation and documentation during the permitting process.
- P-6 Please refer to Response to Comment PPH-66 and General Response GR-2.

- P-7 At the time that PG&E Co.'s Application and Proponent's Environmental Assessment were prepared, detailed design of the Proposed Project had not been completed. The Draft EIR was based on the project description as provided in the PEA. During late 2000 and early 2001, PG&E Co. has been proceeding with design for the Proposed Project, and therefore has identified existing utilities and prepared a more detailed project design. The design diagrams prepared by PG&E Co. were submitted as part of the CPUC's General Proceeding on February 14, 2001 (Exhibit A to that filing). These diagrams acknowledge the presence of existing utilities, including those referenced in this comment. It is apparent from these engineering diagrams that there is sufficient space within the Kottinger Ranch street rights-of-way for all existing utilities in addition to the Proposed Project.
- P-8 See Response to Comment P-7.
- P-9 PG&E Co.'s Proposed Project, as defined in its application before the CPUC, consists of undergrounding the transmission line within the following Kottinger Ranch area streets: Benedict, Smallwood, Hearst, and Bernal Streets. Any deviation from the Project ultimately approved by the CPUC (including routing and construction method) would trigger a "variance approval process" typically used by the CPUC after project approval (see Draft EIR Section F).
- P-10 Please refer to General Response GR-2.
- P-11 No response needed, comment reflects and cites discussion in Draft EIR.
- P-12 As shown in the Executive Summary's Impact Summary Tables, the Draft EIR found several Class II impacts associated with the underground construction for PG&E Co.'s Proposed Project in the Kottinger Ranch neighborhood, including air quality, cultural resources, groundwater hydrology, land use/restricted access, socioeconomics/public services/utilities (impacts on existing roads and utilities), traffic and transportation (lane closures/obstruction, damage to roads and sidewalks, restricted access, bicycle/pedestrian safety, emergency response, bus service). Class II impacts are potentially significant but can be mitigated to a level that is less than significant. The Draft EIR's recognition of the severity of impacts in the residential areas affected by PG&E Co.'s Proposed Project in Pleasanton is reflected in the Comparison of Alternatives for the Pleasanton Area (Section D.3.1/Table D-1), which lists as a Disadvantage for the Proposed Project: "Underground construction and operational impacts on narrow residential streets." The Proposed Project in the Pleasanton Area was not found to be Environmentally Superior in the Draft EIR, and this conclusion has not changed in the Final EIR.
- P-13 The presence of a sinkhole developed within the roadway of Benedict Court was most likely preventable with appropriate engineering techniques and backfill materials. If not corrected, the erosive activity that caused the sinkhole could pose a threat to the proposed underground transmission line. The cause of the sinkhole is most likely piping along one or more of the existing underground utility lines, within the backfill of the trenches. When and if the transmission line is installed within this same street, proper engineering techniques and backfill materials would prevent a recurrence of this type of event.

For PG&E Co.'s project, Applicant Proposed Measure 13.3 is designed to reduce potential impacts associated with slope instability and unstable soil conditions to a level that would be less than significant (see Table C.5-2 on page C.5-25 of the Draft EIR). This measure requires a design level geotechnical investigation be performed to evaluate subsurface conditions,

identify potential hazards, and provide information for development of excavation plans and procedures to limit ground deformation. Also, refer to the second paragraph of Response to Comment PPH-66.

P-14 The Draft EIR addresses the geologic impacts to the southern overhead portion of the Proposed route regarding avoidance of existing landslides and debris flow source areas in the placement of the towers by implementation of Applicant Proposed Measures 13.3 and 13.9, requiring design-level geotechnical investigations to identify potential hazards and avoid them whenever possible (Table C.5-2, pages C.5-25 and C.5-26). However, the Draft EIR does not adequately address the impacts posed by the location and construction of the all weather access road required for construction and maintenance of this segment of the Proposed Project, so the following paragraphs are presented to augment the discussion of access road impacts. This should be considered inserted to Draft EIR Section C.5.3.1.

The Proposed route of the all weather access road crosses one small landslide at approximately Milepost M1.8, lies below two small landslides at approximately Milepost M1.65 and extends across the large older landslide at the northern end of the overhead portion of the Proposed transmission route between approximately Mileposts M2.25 and M2.35. The Proposed route of the road also crosses a mapped debris flow at approximately Milepost M2.0, passes upslope of a small debris flow source area at approximately Milepost 2.05, and passes downslope of a slightly larger debris flow source area at approximately Milepost M2.1 (Majmundar, CDMG, 1991). The unstable nature of the terrain mapped as "mostly landslide" by the USGS (Wentworth et al., 1997) and as the "most susceptible area" for landslides and other features related to soil instability by the CDMG (Majmundar, 1991). These designations are given to areas of slopes which "should be considered naturally unstable, subject to failure even in the absence of the activities of man" (Majmundar, 1991).

The slope instability and unstable soil conditions found along the Proposed Route of the all weather access road may contribute to destabilization of natural and constructed slopes as a result of construction activities. Implementation of Applicant Proposed Measures 13.3 and 13.9 during the design, construction and operation phases of the Proposed Project should ensure that the impacts of the transmission line towers are less than significant **(Class III)** as stated in the Draft EIR in Section C.5.3.1, page C.5-27. However, upon re-evaluation of the conditions for the all weather access road, these measures are deemed insufficient. The impacts to slope instability and unstable soil conditions posed by the proposed all weather access road will be less than significant with implementation of the following additional mitigation measure **(Class II)**.

# Mitigation Measure for Slope Instability and Unstable Soil Conditions.

Destabilization of natural or constructed slopes could occur as a result of construction activities, and from loading of unstable slopes with heavy construction equipment and project facilities. Excavation, grading, and fill operations could alter existing slope profiles and could result in the excavation of slope-supporting material, steepening of slopes, or increased loading, particularly along the proposed all-weather access road in the hills south of Pleasanton.

G-3 PG&E Co. should perform design-level geotechnical investigations to define areas of slope instability along the routes of constructed access roads through areas with known incidence of slope instability and unstable soil conditions. Where possible, areas with the potential for unstable slopes, landslides, mudflows, and debris flows along proposed access road routes should be avoided. Where avoidance of unstable conditions is impractical, excavation or stabilization of unstable slope material may also be performed, including grading of cut slopes, and excavation of unstable materials.

Implementation of this mitigation measure, along with the incorporation of standard engineering practices will ensure that people and structures are not exposed to geologic hazards, and potential impacts are reduced to a less than significant level **(Class II)**.

This mitigation measure should also be applied to portions of the Proposed Phase 2 and Stanislaus Corridor Alternative connections to the Tesla Substation for the construction of all access roads in steep terrain where slope stability is a known hazard.

- P-15 EIR preparers agree with the comment. Potential impacts associated with the proposed route discussed in the Draft EIR are consistent with this comment. The Proposed Route is not the "Environmentally Superior" route.
- P-16 It is acknowledged that the transition structure would be visible to the west and south. However, the visual analysis presented in the Draft EIR only evaluates potential impacts to existing receptors and Proposed Projects. It does not evaluate potential impacts to potential future projects, which have not yet been proposed. Presently, the property to the west and south is not accessible to the general public and therefore, no significant visual impacts would occur under the present or formally proposed future conditions.
- P-17 In order to ensure the avoidance of the potentially significant visual impact that could occur with night lighting of the transition station, the following mitigation measure is hereby added:
  - V-4 All outdoor lighting is to be activated by a switch outside of the fenced facility. The switch is to be accessed by a key and the lights are to be turned on only when emergency work is underway.

Mitigation Measure V-4 applies to all facilities and substations. The CPUC will verify the lighting control design prior to construction and its implementation following construction. This measure will be deemed effective if illumination of the facility is visible only under emergency conditions and at no other time.

- P-18 Potential noise impacts associated with construction of the underground line are addressed C.8.3.1.1 on page C.8-14. According the Applicant's Proponent's Environmental Assessment (PEA), the underground construction activities are anticipated to last for a total of 5 months (PEA, 1999). However, with simultaneous work locations, one on Bernal and one on other streets, PG&E Co. would need only three months of five-day work weeks to complete the 2.7 miles of underground construction (see Construction Methods on page B-22 of the Draft EIR).
- P-19 The Draft EIR at page C.11-18 describes the likely impact of road closures for the Kottinger Ranch neighborhoods if the Proposed Project route is constructed (Impact 11-2). The temporary impacts are termed potentially significant and mitigation measures addressing road closures in the area are proposed (page C.11-19). The Draft EIR Comparison of Alternatives (specifically, Table D-1 for Pleasanton Area alternatives) indicates that the Proposed Project has more severe impacts than the alternatives in terms of disruption to transportation and circulation.

# COMMENT SET P2: CITY OF PLEASANTON AND KOTTINGER RANCH HOMEOWNERS ASSOCIATION, TESTIMONY

- P-20 The suggested "Improved Isabel-Stanley Route" is considered in General Response GR-4, and reasons for its infeasibility are presented in that response.
- P-21 Community values are considered in the CPUC's General Proceeding and will be considered in the CPUC's final decision on the project. As the commenter noted, impacts to many issue areas are analyzed in the Draft EIR; however, community values is not a factor specifically evaluated under CEQA.
- P-22 The commenter's criteria set forth for considering the interests of individuals and the community are acknowledged. As stated in Response to Comment P-21, the CPUC will consider community values in the General Proceeding and the final decision, as well as other factors such as project need and cost.
- P-23 Comment acknowledged; see responses to remaining comments.
- P-24 The commenter's opposition to the Proposed Project is acknowledged. These individual responses are addressed in subsequent responses.
- P-25 Please refer to General Response GR-2.
- P-26 Please refer to Response to Comment P-7.
- P-27 Please refer to Response to Comment P-8.
- P-28 Please refer to Response to Comment P-9 and General Response GR-2.
- P-29 As part of the CPUC's General Proceeding, PG&E Co. provided engineering drawings of the placement of existing utilities and the location within the streets that the Proposed Project would be placed (see PG&E Co.'s February 14, 2001 Rebuttal Testimony, Exhibit A maps). According to PG&E Co., these maps indicate that there is sufficient space in the Kottinger Ranch streets for this project in addition to other utilities. Expert witnesses speaking for PG&E Co. in the General Proceeding stated that the turning radius for solid dielectric cable could be much less than 60 feet.

- P-30 Please refer to Response to Comment PPH-69 regarding the sinkhole in Benedict Court and Response to Comment P-14 regarding the geologic impacts of the Proposed Project. While the undeveloped area (prior to the development of Kottinger Ranch) may have been landslide-prone, installation of homes and graded streets can serve to stabilize shallow soils if proper drainage is provided.
- P-31 Please refer to Response to Comment P-21.
- P-32 The commenter's opposition to placement of the Proposed Project in the Kottinger Ranch area is acknowledged.
- P-33 Vintage Hills Elementary School is over 1000 feet from the Proposed Project's location on either Bernal Avenue and Hearst Drive.
- P-34 Construction impacts of the Proposed Project are described in Draft EIR Sections C.2 (Air Quality), C.6 (Hydrology), C.7 (Land Use and Recreation), C.8 (Noise), and C.11 (Transportation and Traffic). As shown in Impact Summary Tables in the Draft EIR Executive Summary, eight construction impacts are identified, and many mitigation measures are proposed to reduce these impacts (see Final EIR Table F-3). The commenter does not explain which impacts are believed to be understated.
- P-35 The commenter is correct that construction impacts will affect the Kottinger Ranch neighborhood as construction occurs above this area. See Response to Comment P-34 for the Draft EIR's evaluation of construction impacts.
- P-36 Vintage Hills Elementary School is over 1000 feet from the Proposed Project's location on either Bernal Avenue or Hearst Drive. The mitigation measures for construction impacts (see Final EIR Table F-3) would also reduce impacts at this school or for parents and students driving or walking to the school.
- P-37 Draft EIR Section C.7 evaluates land use and recreation impacts. The mitigation measures for construction impacts (see Final EIR Table F-3) would also reduce impacts at recreation areas near the Proposed Route.
- P-38 See Response to Comments P-39 to P48.
- P-39 The commenter is correct that the Draft EIR concluded that biological impacts would be greater for the Proposed Route than for the S1 or S2 Alternatives. However, as stated in the Draft EIR, the biological impacts are not significant after implementation of mitigation.
- P-40 Mitigation measures and Applicant Proposed Measures presented in Draft EIR Sections C.5 (Geology and Soils) and C.6 (Hydrology and Water Quality) would ensure that slope stability impacts were not significant along the proposed route in the Pleasanton area.
- P-41 Consistency of the Proposed Project with existing plans and policies of the City of Pleasanton is analyzed in detail in Draft EIR Section C.7.1.2.3.
- P-42 The Draft EIR analysis of visual resources (Section C.12.3.1) determined that there would not be significant visual impacts from the overhead portion of the Proposed Project. The rationale for this determination and the methodology for visual resources analysis are presented in Sections C.12.3.1 and C.12.2.2, respectively. Consistency of the Proposed Project with

existing plans and policies of the City of Pleasanton is analyzed in detail in Draft EIR Section C.7.1.2.3.

- P-43 The EIR does not address impacts to speculative future projects that have not yet been proposed.
- P-44 See Response to Comment to P-17.
- P-45 See Respone to Comment P-18
- P-46 Section C.11, Transportation and Traffic, presents 11 mitigation measures that are intended to reduce traffic impacts, including safety for pedestrians, during construction.
- P-47 See General Responses G-1 and G-2.
- P-48 As stated in PG&E Co.'s Rebuttal Testimony (2/14/01), one lane would always be open for through traffic during construction, even on the smallest streets.
- P-49 This comment addresses legal and timing issues that will be considered in the CPUC's General Proceeding but that are beyond the scope of this EIR.
- P-50 Cost issues are not considered in the CEQA process but will be evaluated in the CPUC's General Proceeding.
- P-51 Community values will be addressed in the CPUC's General Proceeding. It should be noted, however, that the community values of the City of Pleasanton are at odds with those of the City of Livermore in this case. The City of Livermore and its residents are strongly opposed to the L1 Alternative that Pleasanton is supporting. See General Responses G-1 and G-2 regarding EMF concerns and underground construction.
- P-52 As explained in General Response G-2, other 230 kV underground lines have been installed in residential neighborhoods. The Draft EIR, in the Comparison of Alternatives (Section D) acknowledges that the construction impacts in narrower residential streets would create more severe (though still less than significant) impacts than along wider streets (such as Vineyard Avenue).
- P-53 See Response to Comment to P-34.
- P-54 See General Response G-2.
- P-55 The referenced vaults would be installed below the street and their surface would not obstruct traffic in any way. See General Responses G-1 and G-2.
- P-56 PG&E Co.'s pre-application consultation process is not an issue for EIR consideration.
- P-57 PG&E Co. is not responsible for public outreach after submittal of its application (late 1999). See Final EIR Section G which summarizes the extensive public involvement effort carried out during the CEQA process.
- P-58 See General Response G-4.

- P-59 The City argues that the S4 Alternative is inferior. It is noted that this alternative was suggested by the City. Draft and Final EIR Sections D present information on comparison of alternatives; the S4 Alternative was determined to be inferior to the Environmentally Superior route (S2 with S2A Alternatives).
- P-60 The issues presented in this comment contributed to the Draft EIR's determination that the S4 Alternative was not Environmentally Superior.
- P-61 Land acquisition timing issues are not considered in the EIR, but will be considered in the CPUC's General Proceeding.
- P-62 Cost issues are considered in the CPUC's General Proceeding.
- P-63 See General Response GR-4.
- P-64 Note that the S2A Alternative has been modified to move it out of Park property (see Final EIR Section B.2.)
- P-65 See General Response GR-4.
- P-66 While the S2A Alternative does not extend north or west of Vallecitos Road, it could be used with either the S1 or S2 Alternatives. See Response to Comment P-64.
- P-67 The commenter argues that decisions regarding alternatives should primarily be based on the number of homes in close proximity to the route. While these issues (related to residences) are generally considered in the EIR's comparison of alternatives, many other factors are also important. Draft EIR Sections C.2 through C.12 address the wide range of environmental issues that are considered in the comparison of alternatives.
- P-68 See Response to Comment P-34 regarding construction impacts.
- P-69 See Response to Comment P-67.
- P-70 The commenter's argument in favor of the S1 Alternative also supports the use of the S2 Alternative along Vineyard Avenue over the Proposed Route.
- P-71 Potential impacts on existing and planned school are addressed in Draft EIR Section C.7.
- P-72 Note that the existing 60 kV line along Stanley Boulevard would not be replaced with the S1 Alternative's 230 kV line. The 230 kV line would be installed in addition to the 60 kV line. The visual impact of the S1 Alternative on Shadow Cliffs Regional Park is acknowledged in Draft EIR Section C.12.3.2.4 and is determined to be adverse but not significant given the existing industrial surroundings of the park.
- P-73 The existing 21 kV distribution lines on Isabel would not be moved underground if the 230 kV line were installed underground in that area. See General Response G-4.
- P-74 While the Draft EIR (Section D.3.1) does conclude that the S2 Alternative is Environmentally Superior to the Proposed Project, it does not conclude that the S1 Alternative is superior to the Proposed Project.

- P-75 The comment is incorrect. As stated in Draft EIR Table D-1, the S1 Alternative would have the greatest potential to impact cultural resources.
- P-76 See General Response G-4 regarding the suggested underground installation of S1 along Isabel Avenue.
- P-77 The Draft EIR agrees with this discussion of the general industrial setting of the Stanley Boulevard Corridor. See General Response G-4 regarding the infeasibility of undergrounding the Isabel Avenue segment of the S1 Alternative.
- P-78 As previously discussed, installation of an underground line along Isabel Avenue may not be feasible. The Draft EIR concurs that the overhead lines along Stanley Boulevard would not create a significant visual impact given the industrial setting of the area.
- P-79 The Draft EIR concurs that the noise impacts of all alternative are less than significant.
- P-80 EIR preparers agree with the stated conclusion, with the exception of the reference to underground lines along Isabel Avenue.
- P-81 Please see Caltrans' comment letter (Comment Set M) regarding undergrounding transmission lines in state highway rights-of-way, as well as General Response GR-4. Please see General Response GR-3 regarding potential property value impacts.
- P-82 Please see Response to Comment P-1 regarding underground lines along Isabel Avenue. If such a route were feasible within the roadway, the construction impacts on traffic could be mitigated to less than significant levels with mitigation measures presented in Draft EIR Section C.11. Note that this is also the impact conclusion for the Proposed Route and the S2 or S4 Alternatives through Pleasanton.
- P-83 Timing of project completion will be evaluated in the CPUC's General Proceeding and not as part of the CEQA process.
- P-84 Cost issues will be evaluated in the CPUC's General Proceeding and not as part of the CEQA process.
- P-85 The commenter states that the suggested revision of the S1 Alternative (to include undergrounding along Isabel Avenue) would be superior to other routes. Because an underground route along Isabel Avenue has not been evaluated due to feasibility concerns, the EIR makes no conclusions or comparisons about this suggested route.
- P-86 The commenter's support of the S2A variation is acknowledged. Note that this route has been modified as explained in Final EIR Section B.2.
- P-87 The commenter's acknowledgement of the feasibility of the S2 Alternative is acknowledged.
- P-88 See Response to Comment P-86.
- P-89 See Response to Comment P-21.
- P-90 The potential impacts to traffic that could result from construction on Vineyard Avenue and Bernal Avenue are acknowledged in Draft EIR Section C.11, where 11 mitigation measures are

proposed to reduce impacts to less than significant levels. Note also that, as requested in this comment, the Final EIR considers the use of New Vineyard Avenue for the S2 or S4 Alternatives (see Final EIR Section C.2.)

- P-91 See Response to Comment to P-90. The Final EIR also considers the Quarry Route (S5); see Figure B-4, that would pass the Iuka Substation, using overhead transmission towers north of Del Valle Creek to Stanley Boulevard.
- P-92 The S5 (Quarry Route) as defined in Final EIR Section B.4 would not be completely underground. It would be overhead through the quarry and along Stanley Boulevard. See analysis in Final EIR Section C.3.
- P-93 See Final EIR Section C.3 for the EIR's impact conclusions regarding the S5 (Quarry Route) Alternative.
- P-94 See Final EIR Table D-1 for comparison of impacts among Pleasanton Area alternatives.
- P-95 The EIR does not evaluate the "improved" Isabel-Stanley route so no comparisons can be made. See General Response GR-4.
- P-96 Cost issues will be addressed in the CPUC's General Proceeding but are not considered in the CEQA process.
- P-97 In response to this comment and others, the Final EIR has evaluated the use of New Vineyard Avenue as a component of either the S2 or S4 Alternatives (see Final EIR Section C.2).
- P-98 The commenter's support of the Proposed Dublin Substation is acknowledged.
- P-99 This comment accurately summarizes the Draft EIR's conclusions regarding the D1 Alternative.
- P-100 See Responses to Comments J-13, 123-15, 123-17, and PPH-147.
- P-101 According to the City of Dublin, the land around the D1 Substation is zoned for commercial development, and that development has been approved by the City. There is some open space adjacent to the D1 transmission line route; see Responses to Comments F-1 through F-5.

# H.3 RESPONSES TO WRITTEN COMMENTS ON THE DRAFT EIR FROM INDIVIDUALS OR PRIVATE COMPANIES

## COMMENT SET 1: SALLY SCHOLL

1-1 The commenter's preference for the Proposed Project in the Dublin/San Ramon area is acknowledged.

## **COMMENT SET 2: GEORGE GRENLEY**

2-1 The commenter's preference for the Proposed Project in the Pleasanton area is acknowledged.

H-53

#### COMMENT SET 3: KRISTINA AND DAVID REEVE

3-1 The commenter's opposition to locating the transmission lines along residential streets in Pleasanton and preference for running the transmission line along Stanley Boulevard are acknowledged.

#### **COMMENT SET 4: HOWARD MOHR**

4-1 Please refer to Section A.2, Purpose and Need for the Proposed Project, of the Draft EIR for a detailed explanation of how this project will serve the Tri-Valley area.

#### **COMMENT SET 5: DAVID REEVE**

5-1 The commenter's opposition to the Vineyard Avenue portion of S2 and S4 in Pleasanton and preference for the S1 Alternative in Pleasanton and Livermore are acknowledged.

#### COMMENT SET 6: PHYLLIS G. FARRELL

6-1 The process for selecting and evaluating alternatives was based on CEQA requirements, as described in Draft EIR Section B.5, and political influence played no part. As described in Draft EIR Sections B.5 and B.6, many alternatives to PG&E Co.'s Proposed Project were considered for EIR evaluation. The Draft EIR fully evaluated three alternatives to the Proposed Route through Pleasanton: the S1 Alternative (along Isabel and Stanley), the S2 Alternative (along Vineyard Avenue), and the S4 Alternative (through the open space west of Ruby Hill to Vineyard Avenue). The S2 Alternative (which starts in Livermore but is primarily within Pleasanton) was found to be the Environmentally Superior Alternative, as described in Draft EIR Section D.

The commenter's preference for the Proposed Route through Pleasanton is acknowledged. The location of underground versus overhead transmission lines is based on evaluation of feasibility (whether or not the lines could be constructed) and on environmental factors. As described in General Response GR-4, the Isabel Avenue portion of the S1 Alternative cannot feasibly be installed underground.

Regarding the commenter's statement that lines in Livermore should serve only Livermore residents and businesses, see General Response GR-5.

#### COMMENT SET 7: JOHN D. FARRELL

7-1 See Response to Comment 6-1.

#### COMMENT SET 8: MATTHEW A. PERRAULT

8-1 The commenter's opposition to the S1 Alternative along Isabel Avenue in Livermore is acknowledged. Please also see General Response GR-5.

#### **COMMENT SET 9: SAL SANCHEZ**

9-1 The commenter's opposition to the S1 Alternative along Isabel Avenue in Livermore is acknowledged. Please see General Responses GR-1, GR-3, GR-4 and GR-5.

## COMMENT SET 10: MATTHEW CORDES

10-1 The commenter's opposition to the S2 Alternative and S1 Alternative along Isabel Avenue are acknowledged. Please also see General Responses GR-4 and GR-5.

## **COMMENT SET 11A: FRED LAMONICA**

11-1 Please see General Response GR-4 regarding the S1 Alternative along Isabel Avenue. Overhead high voltage transmission lines are still frequently constructed throughout the U.S. Such lines are installed underground in highly sensitive areas or in areas (e.g., near schools and within residential areas) where aboveground lines are dangerous (e.g., near airports).

# COMMENT SET 11B: FRED LAMONICA

- 11-2 Comment indicates concerns about property value impacts on homes east of Isabel Avenue, and cites research on the subject. The research cited asserts that "homes not directly adjacent to the ROW or beyond 200 feet from the ROW were affected to a much lesser degree than those abutting the line or ROW (Kung and Seagle, Hamilton and Schwann). See General Response GR-5 about impacts on property values. As described in General Response GR-4, the visual analysis rated this segment as an adverse but not significant impact.
- 11-3 Please see General Responses GR-1 and GR-2.
- 11-4 The commenter is correct that the S1 Alternative's 230 kV transmission line towers would be substantially higher than the existing distribution power lines along Isabel Avenue. The 230 tubular kV poles would range in height from 80 to 150 feet (depending on the length of the span and the angle of the line).
- 11-5 The commenter is correct that the S2 Alternative is very similar to that approved by the CPUC in 1988 as an "all underground route." The 1999 Draft EIR concluded that the S2 Alternative was the Environmentally Superior Alternative, for many of the reasons stated in this comment.
- 11-6 See General Response GR-4 regarding the visual impact of the S1 Alternative. The Quarry Route has been reconsidered based on comments on the Draft EIR; analysis is presented in Final EIR Section C.3.
- 11-7 The responses to specific components of this comment may be found as listed below:
  - 1. See General Response GR-4
  - 2. See Response to Comment GR-1
  - 3. See Response to Comment GR-1
  - 4. See Response to Comment GR-3
  - 5. See Response to Comment GR-4
- 11-8 Regarding the commenter's concern that the City of Livermore or the residential developers should have issued a disclosure to potential purchasers along Isabel Avenue, the CEQA process for the Tri-Valley 2002 Capacity Increase Project has involved a significant amount of public notification, as described in Final EIR Section G. The City of Livermore has been aware of the S1 Alternative since at least July 2000, through the CPUC's continuing consultation with its Planning Department. This notification was carried out by the CPUC, and was far in excess of that required by CEQA. Also, as described in Section C.9.2.1.1, this project would be

constructed in compliance with the CPUC's 1993 Decision regarding EMF impacts and mitigation. See Response to Comment PPH-51.

# COMMENT SET 11C: FRED LAMONICA

- 11-9 The CPUC has implemented a comprehensive public involvement for this project, as documented in Final EIR Section G. After a Notice of Preparation of a Draft EIR was mailed to agencies and local jurisdictions, a Notice of Public Scoping Meetings was published in the following newspapers on the corresponding dates.
  - The Tri-Valley Herald: May 3<sup>rd</sup> and 4<sup>th</sup>, 2000
  - Alameda Times-Star: May 3<sup>rd</sup> and 4<sup>th</sup>, 2000

In July 2000, a Scoping Report was issued summarizing issues and concerns received from the public and various agencies. This report was mailed to those agencies and individuals who registered at the scoping meetings or requested copies, and placed in four local libraries and on the CPUC's Project web page.

A Project Newsletter was mailed to the EIR mailing list in early November 2000 to describe the EIR process and the alternatives selected for detailed analysis in the Draft EIR. The newsletter was also available at the EIR repositories (libraries) and on the Project web page.

The Draft EIR was officially released on December 26, 2000. The original comment period ended on February 20, 2001 but was extended to a 53-day comment period ending on February 23, 2001. In accordance with the CPUC's Rule 17.1, which requires two notices in a newspaper, a Notice of Availability of the Draft EIR was published in the following local newspapers on the dates shown:

- Alameda Times Star: January 3<sup>rd</sup> and 18<sup>th</sup>, 2001
- Tri-Valley Herald: January 3<sup>rd</sup> and 18<sup>th</sup>, 2001

In addition, the Notice of Availability was mailed on December 15, 2000 to the entire Tri-Valley EIR mailing list. The bulk of the mailing list was purchased from a mailing house company in September 2000; it consisted of approximately 10,500 recipients based on carrier routes adjacent to the Proposed Project and Alternative routes.

All Draft EIR commenters will be added to the Tri-Valley project mailing list and will receive ALL future project mailings.

- 11-10 Please see Response to Comment 11-9.
- 11-11 Please see Response to Comment 11-2.
- 11-12 Please see General Response GR-1.
- 11-13 Please see General Response GR-4.
- 11-14 Please see General Response GR-4.
- 11-15 The cost of the Proposed Project or alternatives will be considered in the CPUC's general proceeding and is not within the scope of this EIR.

# COMMENT SET 12: BILL RUEFF

12-1 The commenter's preference for the Environmentally Superior Project is acknowledged.

# COMMENT SET 13: DONNA L. DICKEY

13-1 The commenter's preference for the Proposed Project in the Dublin/San Ramon area is acknowledged.

# **COMMENT SET 14: JOHN COLLINS**

14-1 The commenter's opposition to the Environmentally Superior route along Vineyard Avenue is acknowledged. Please also see General Response GR-1.

# COMMENT SET 15: TIM RYAN

15-1 The commenter's opposition to PG&E Co.'s Proposed Project in the North Livermore area is acknowledged. The Dagnino Road substation site was eliminated (see Draft EIR Section B.5.4.3.2) because it would move the substation farther from the load that it would serve and because the overhead lines feeding the station would be within the area that would affect the FCC Monitoring Station. The commenter prefers the L1 Alternative and P3 Alternative; the P3 Alternative was found to be Environmentally Superior to other "build" alternatives in the Draft EIR.

# COMMENT SET 16: JAMES E. MCFEELEY

- 16-1 The Impact Summary Tables (at the end of the Executive Summary of the Draft EIR) show that 16 significant and unavoidable impacts were identified for the Proposed Project and various alternatives. The EMF/safety hazards evaluated in the Draft EIR were not determined to be significant impacts, but in several areas, significant visual impacts were identified.
- 16-2 Explicit scoring is not often used in EIR comparison of alternatives because the assigning numerical values to impacts implies a less subjective process, while the assignment of weighting factors is in fact very subjective. To one person, impacts on sensitive or endangered species may be the most critical factor in evaluating a project, and to another the most critical factor may the long-term protection of scenic views or avoidance of disturbing cultural or Native American resources. When impacts occur near developed areas, local residents would always weight impacts near their residences as greater than any others. For this reason, the comparison of alternatives in EIRs is usually done (as it was here) using a large matrix that describes impacts of the alternatives and presents a ranking of those impacts for each environmental discipline.
- 16-3 The commenter's preference for the S1 Alternative is acknowledged. The EIR acknowledges the industrial character of the Stanley Boulevard corridor. Please see General Response GR-4 regarding the potential for undergrounding the Isabel Avenue segment.

# COMMENT SET 17: LESLIE PICKETT

17-1 Please see General Response GR-4 regarding the impacts along the Isabel Avenue corridor. As described there, the Draft EIR preparers did carefully evaluate this corridor both in developing the S1 Alternative and in evaluating its impacts. The commenter notes that the S2 Alternative is an environmentally appealing alternative – it is this alternative that the Draft EIR determined

to be Environmentally Superior. The commenter's closing statement illustrates the difficulty in routing transmission lines in this growing area: the commenter states that routing a transmission line through open space "is a downright crime", whereas many other commenters have specifically requested that the transmission line be routed in open space in order to reduce impacts to residents/occupants of more developed areas.

# COMMENT SET 18: ROSEMARY NEWMAN

18-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and preference for the S2 Alternative along Vineyard Avenue is acknowledged. Please also see General Response GR-4 regarding undergrounding along Isabel Avenue.

# COMMENT SET 19: NANCY C. SCHLACHTE

19-1 Please see General Response GR-1.

# **COMMENT SET 20: CHARLES NEUENSCHWANDER**

20-1 The commenter's opposition to the S1 Alternative along Isabel and preference for the Proposed Project or S2 Alternative in Pleasanton are acknowledged. Please also see Response to Comments G-5 and 11-1 regarding perceived unfair impacts to Livermore residents for Pleasanton's electrical needs.

## COMMENT SET 21: CHRIS AND INDIE FEDUNIW

- 21-1 Please see General Response GR-4.
- 21-2 The comment does not state where the estimated 60 to 80 years of continued quarry operations is set forth. The Draft EIR states on page C.7-23 that the *Livermore-Amador Valley Quarry Reclamation Plan* anticipates completion of quarry operations by 2030. Representatives of the quarry operators along the west side of Isabel Avenue have stated that they will complete quarrying the area west of Isabel Avenue by 2030 at the earliest. Their mining permit allows them to mine aggregate until 2030, with an option to extend the permit period by five years. It is true that the quarry area will eventually be turned into a Chain of Lakes. However, the Chain of Lakes is not intended to become either a city or regional park, despite developer claims to the contrary. The reclamation plans entitling the mine operators to extract aggregate stipulate that the properties will be deeded to the Zone 7 Water Agency following completion of mining activities. Zone 7 will be operating the Chain of Lakes as a water management facility (flood control, water storage, groundwater recharge, etc.), and anticipates allowing little if any public access to the lakes or recreational use of the lakes.
- 21-3 Please see General Response GR-4 regarding the impacts of the S1 Alternative along Isabel Avenue and discussion of installing this line underground on the east or west sides of Isabel Avenue. Caltrans' comment letter (see Comment Set M) states that longitudinal encroachments are not allowed in freeway or expressway rights-of-way. The buried utilities that run parallel to and within Isabel Avenue have been relocated to the landscaped areas east of the roadway.

## COMMENT SET 22: CARLA KELLER

22-1 The commenter's opposition to the S1 Alternative is acknowledged. Please see General Response GR-4 for more information on this route.

- 22-2 Comment indicates concern about property value impacts along Isabel Avenue. See Response to Comment 11-2.
- 22-3 Please see General Response GR-4.

# COMMENT SET 23: LINDA PFLUGHAUPT

23-1 The commenter's opposition to the Environmentally Superior route along Vineyard Avenue in Pleasanton and preference for the S1 Alternative along Isabel Avenue and Stanley Boulevard are acknowledged.

# **COMMENT SET 24: MICHAEL PROKOSCH**

24-1 The commenter's opposition to the S1 Alternative is acknowledged. Please see General Response GR-4.

# COMMENT SET 25: JAMES TANTON

25-1 The commenter's opposition to the S1 Alternative is acknowledged. Please also see General Response GR-4 regarding issues related to the S1 Alternative and General Response GR-3 regarding property value.

# COMMENT SET 26: STEVEN F. BRADLEY

26-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged.

## COMMENT SET 27: TOM AND VICKIE GRAMMATICA

27-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please see General Response GR-4 regarding undergrounding along Isabel Avenue.

## COMMENT SET 28: NANCY BYRON

28-1 Please see Response to Comment 11-9 regarding public involvement/notification on the project. The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please see General Response GR-5 and Response to Comment 11-1 regarding Pleasanton power issues.

## COMMENT SET 29: CAROLYN NEWTON

- 29-1 Please see General Responses GR-1 and GR-2.
- 29-2 The Draft EIR evaluated a wide range of alternatives, in compliance with CEQA and as described in Draft EIR Section B.5. When designing a project to bring electric power into a highly developed area, it is very difficult to find an alternative that completely avoids residential neighborhoods.
- 29-3 Please see General Response GR-4 regarding the S1 Alternative along Isabel Avenue and the potential for installing that segment underground.
- 29-4 The underground transmission line proposed through the Kottinger Ranch area would be installed within a concrete duct bank, so minor land shifting in the area would not affect the

lines. As described in Draft EIR Section C.5 (Geology and Soils), the potential for ground shaking to affect the lines is not considered to be significant, and there are no active faults crossed by this portion of the Proposed Project.

- 29-5 Please see General Response GR-1.
- 29-6 Please see General Response GR-2.
- 29-7 Please see General Response GR-3.
- 29-8 Please see Response to Comment PPH-70.
- 29-9 The commenter's preference for the Environmentally Superior route, along Vineyard Avenue in comparison to the Proposed Project in the Kottinger Ranch development, is acknowledged.

## COMMENT SET 30: GREG AND CHRISTINE TUELL

- 30-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and Stanley Boulevard is acknowledged.
- 30-2 Please see General Response GR-1.
- 30-3 Please see General Response GR-3 regarding potential impacts to property values, and General Response GR-5 and Response to Comment 11-1 regarding the transmission line's service to only the Pleasanton area.

## COMMENT SET 31: RALPH MOIR

31-1 The commenter's preference for the S2A Alternative and opposition to the Proposed Project are acknowledged. Please see General Response GR-3 regarding property values.

## COMMENT SET 32: CONNIE MALONE

32-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please see General Response GR-5 and Response to Comment 11-1 regarding Pleasanton power.

## COMMENT SET 33: WOLFGANG TERTEL

33-1 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged.

## COMMENT SET 34: ROBERT F. STEARNS

34-1 Please see General Response GR-4 regarding the Isabel Avenue portion of the S1 Alternative.

## COMMENT SET 35: JEFF ROY

- 35-1 Please see General Response GR-4.
- 35-2 See the Draft EIR discussion of bird collisions under C.3.2.5.2, *Wildlife*. According to Hartman et al. (1992), gulls, terns, passerines, and raptors are probably not adversely affected by power lines. Raptors are mostly diurnal and frequently use transmission towers for roosts and even nest sites. Their excellent vision reduces the potential for collision with lines.

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- 35-3 According to <u>www.hotairballooning.com</u>, "*Large transmission lines, with their tall support structures, cleared rights of way, and multiple phases, are easy to spot from a balloon.* More difficult are the smaller transmission and distribution lines running along roadways and across fields. Since the prevailing wind direction in the northern hemisphere is from the west, and because balloons fly shortly after sunrise, pilots often look into the sun, and those thin steel lines can be very hard to see. So balloonists look for support structures, and always suspect lines along roads. If the balloon does contact power lines, everyone on the ground must stay well clear of the basket until the electric company shuts off the flow." (emphasis added)
- 35-4 Impacts of the project and alternative on the Livermore Municipal Airport are considered in Draft EIR Section C.7; additional discussion is presented in Response to Comment A-14.

## COMMENT SET 36: DEANNA ARONOFF

36-1 Please see General Response GR-4.

## **COMMENT SET 37: JAMES AND TERRISA TRUTTMAN**

37-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and Stanley Boulevard is acknowledged. Please see General Response GR-5 and Response to Comment 11-1 regarding Pleasanton power.

#### COMMENT SET 38: JERRY LAU

38-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged.

#### COMMENT SET 39: PATRICK AND DIANNE DUFFY

- 39-1 The commenter supports the need for the Proposed Project but none of the routes evaluated in the Draft EIR. The Draft EIR (Section C.12) finds a significant and unavoidable **(Class I)** impact for both the Proposed Project Phase 2 in the vicinity of the Brushy Peak Preserve and for the Brushy Peak Alternative. The commenter's concern for the Brushy Peak Regional Preserve is acknowledged in the Draft EIR, which selects the Switching Station Alternative over the Proposed Phase 2 route (near Brushy Peak Preserve) as the Environmentally Superior Alternative for Phase 2. Note that as described in Final EIR Section B.6, the Brushy Peak Alternative has been eliminated from consideration.
- 39-2 Please see General Response GR-1.
- 39-3 It is assumed that the commenter's reference to a "transfer station" pertains to an overhead-to-underground transition structure, as neither the Proposed Project nor any of the alternatives include installation of a substation (a "transfer station" typically refers to a type of solid waste management facility). The Draft EIR identifies several significant impacts on Sycamore Grove Regional Park from the alternatives that pass through the park (Alternatives S1/S2/L2). Potential impacts to cultural resources are identified and mitigation is recommended on pages C.4-13 through C.4-14. Land use and recreation impacts on the park are discussed and mitigation measures are recommended on pages C.7-46 through C.7-47. Visual impacts in the park are described and mitigated on pages C.12-29 through C.12-30. General impacts to biological resources are also addressed in Section C.3.2 of the Draft EIR. In addition, Alternative S2A, described in Section B.1 of this Final EIR, was modified in response to comments on the Draft EIR expressly to avoid all impacts to Sycamore Grove Regional Park.

39-4 The appropriate forum for suggesting alternatives to the Proposed Project is through the CEQA process, which has included many opportunities for public involvement. As described in Final EIR Section G, three public scoping meetings were held in May of 2000 and EIR scoping comments were accepted through June 1, 2000. The CPUC has consulted with local jurisdictions since May 2000, and a series of public workshops and hearings was held in February and March, 2001. The Draft and Final EIRs are intended to inform decisionmakers of the potential for the project to impact the residents of the area for which the project is proposed. Please note that the "solution" referenced in the comment developed by the City of Pleasanton and the Kottinger Ranch Homeowners Association is a modification of the Draft EIR's Alternative S2, which has been considered for the Final EIR (see Response to Comments P-2 and P-2). Note also that the S5 (Quarry Rout) Alternative has been considered in the Final EIR (see Section B.4).

# COMMENT SET 40: NANCY STORCH

- 40-1 Mitigation Measure T-4 (see page C.11-20 of the Draft EIR) requires PG&E Co. to coordinate repairs of damaged roads with the affected public agency to ensure that any impacts to area roads are adequately repaired and that roads disturbed by construction activities shall be properly restored.
- 40-2 Potential noise and traffic impacts that would occur along Vineyard Avenue due to implementation of Alternatives S2 and S4 (which affect Vineyard Av.) are described in Sections C.8.3.3 and C.11.3.3, respectively. Impacts are determined to be less than significant.
- 40-3 Operational impacts on the planned synagogue associated with upgrades to the existing Vineyard Substation were not addressed in the Draft EIR because the synagogue did not exist at the time the Draft EIR was published. However, similar to the impacts on the nearby mobile home park that are described in the second paragraph on page C.8-17 of the Draft EIR, impacts would be less than significant because three transformers are currently in operation at the Vineyard Substation and noise associated with the planned upgrades would not significantly raise levels above the existing ambient level. The planned synagogue is included in the Draft EIR's list of Cumulative Projects; see Table E.3-1.
- 40-4 Potential air quality impacts associated with operation of the Tri-Valley 2002 Capacity Increase Project are described in Section C.2.3.1.2 of the Draft EIR. Materials that would be released into the environment because of proposed operations would include exhaust (e.g., CO, NOx, O<sub>3</sub>, etc.) and particulate (PM10) emissions associated with maintenance, monitoring, and inspections. Potential impacts related to these operational activities are expected to be less than significant. It is anticipated that these limited emissions would have negligible affects on people with breathing problems in the project area.
- 40-5 Please see General Response GR-1.

# COMMENT SET 41: CHUCK AND JUDY BARNETT

41-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and preference for the Environmentally Superior route along Vineyard Avenue in Pleasanton are acknowledged. Please see General Response GR-4 regarding visual impacts of the S1 Alternative along Isabel Avenue.

## COMMENT SET 42: BETSY WILSON

42-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and preference for the Environmentally Superior route or Proposed Project in Pleasanton are acknowledged. Please also see General Response GR-4 regarding visual impacts of the S1 Alternative along Isabel Avenue.

## COMMENT SET 43: GLENN RITTENHOUSE

43-1 The commenter's opposition to the S1 Alternative is acknowledged. Please see Response to Comment 11-9 regarding public involvement/notification.

#### **COMMENT SET 44: COLLEEN NESPOR**

- 44-1 The CPUC has undertaken a comprehensive public involvement program as part of the CEQA analysis of the Proposed Project and alternatives. The public has been given many opportunities to voice their concerns and suggestions about this project and the EIR (see Final EIR Section G) and Response to Comment 11-9. The EIR preparers were aware of the Vineyard Avenue Corridor Specific Plan and have evaluated impacts related to that development in the Draft EIR; see Response to Comment 68-2.
- 44-2 Please see General Response G-1.

#### COMMENT SET 45: RANDALL FROST

45-1 Please see General Response G-1.

#### COMMENT SET 46: LINDA PFLUGHAUPT

46-1 Please see Comment Set M, the comment letter from CalTrans which addresses CalTrans' position regarding underground utilities within highway rights of way. See also General Response GR-4 regarding the Isabel Avenue portion of the S1 Alternative.

#### COMMENT SET 47: GREG ALBIN

47-1 The commenter's opposition to the Proposed Project and Environmentally Superior route in Pleasanton and preference for the S1 Alternative along Isabel Avenue and Stanley Boulevard are acknowledged.

#### COMMENT SET 48: CECIL BEEBE

48-1 Please see Response to Comment 49-3 regarding Stanislaus corridor.

#### COMMENT SET 49: PHILIP R. WENTE

49-1 The Draft EIR explains the history of PG&E Co.'s proposals for transmission upgrades in this area in Section A.1. The Advisory Group referenced in this comment was a group organized by PG&E Co. to obtain input into their route development process, which preceded their Application to the CPUC and resulted in identification of PG&E Co.'s Proposed Project. This group's input was only relevant <u>before</u> PG&E Co.'s application was submitted to the CPUC. Since submittal of the Application, PG&E Co. has been involved in the alternatives identification process in the same manner as the public. The CPUC's CEQA process has been

underway since April 2000 to evaluate the Proposed Project and to develop alternatives. As described in Final EIR Section G, public input has been sought throughout the CEQA process, starting with a series of Scoping Meetings in May 2000. These meetings were announced in local newspaper advertisements and via a mailing to approximately 1,100 public agencies, organizations, and individuals. The CPUC's Scoping Report, published in July 2000, documents the extensive input sought and received by the CPUC during the EIR Scoping Period. Records indicate a notice of the meeting was mailed to Gresta Blanca Golf, LLC, at 5565 Tesla Road in Livermore, which is the same address as that listed on the commenter's winery stationery.

The commenter references a November mailing; this newsletter (mailed to 11,000 postal customers, again including the commenter, along the Proposed Project and Draft EIR Alternative routes) summarized the alternatives that had been developed based on public and agency input presented during Scoping and EIR preparers' analysis. This newsletter included the Stanislaus Corridor upgrade as one alternative to PG&E Co.'s Proposed Phase 2 project. As explained in this newsletter, the Stanislaus Corridor Alternative replaced the "T1-Tiger Creek" Alternative described in the July Scoping Report due to actions taken by the CAISO in the interim which made the Tiger Creek Line (in the Tesla-Newark Corridor) unavailable. The Stanislaus Corridor Alternative was also included in the July Scoping Report, but dropped from study at that time given the availability then of the Tiger Creek Line Alternative. See also Response to Comment 49-3.

- 49-2 The commenter's statement that any lines along Vineyard Avenue should be underground is consistent with the conclusion of the Draft EIR that the environmentally Superior Alternative in the Southern Area was the S2/S2A Alternative (entirely underground).
- 49-3 First, please see Response to Comment A-19, which addresses a similar proposal for one transmission corridor from Tesla Substation to Newark and that the Stanislaus line towers (currently unused along most of the line's length through the Tri-Valley area) be removed. Elaborating on Response to Comment A-19, following are the advantages and disadvantages of this proposal:

**Advantages:** (a) One existing corridor (Stanislaus Corridor, consisting of a pair of lattice towers) through the Tri-Valley area could be eliminated; (b) major transmission lines would be consolidated in a single corridor (the Tesla-Newark Corridor) which already has three or four major lines (depending on location); (c) if PG&E Co. were willing to sell the right-of-way to adjacent landowners, these landowners along the Stanislaus Corridor would obtain use of the currently unproductive agricultural land where the towers are now located.

**Disadvantages:** (a) The Tesla-Newark Corridor would need to be widened by approximately 100 - 200 feet to allow for the new 230 kV line to be installed, requiring impact assessment of this new land use along the entire 12-14 mile corridor (including impacts to biological and cultural resources, land use, visual resources, for example); (b) while the CPUC could compel removal of the unused Stanislaus towers as visual mitigation for the new line, it is not clear that the CPUC could compel PG&E Co. to sell the Stanislaus Corridor right-of-way to adjacent landowners, especially since it would still be available for future expansion when/if demand arose in the future.

49-4 Please see Response to Comment 49-3.

49-5 Comment acknowledged.

## **COMMENT SET 50: ZHANG FAMILY**

- 50-1 Please see General Response GR-1.
- 50-2 Please refer to Table C.8-1 on page C.8-11. The 45 dB protective level referenced at p. C.9-15 is for indoor residential areas.
- 50-3 Visual impacts are addressed in Section C.12 of the Draft EIR. Visual impacts specific to the Pleasanton area are analyzed in Section C.12.3. Three mitigation measures are presented that, if implemented, would eliminate a potentially significant visual impact.

## COMMENT SET 51: P. HAWKINS

- 51-1 Please see General Response GR-2 regarding safety and PG&E Co.'s experience constructing and maintaining underground transmission lines.
- 51-2 Please see General Response GR-2.
- 51-3 Please see General Response GR-1.
- 51-4 Section G of the Final EIR summarizes the pubic involvement process that has been in place since the CEQA process began in April 2000. The Draft EIR attempted to address all issues, especially those related to public safety, that were raised during Scoping. The CPUC recognizes that the Draft EIR may present conclusions different than those of some readers, but it represents a reasoned and rational analysis of the concerns expressed. Please see also General Responses GR-1 and GR-2.
- 51-5 The need for the Proposed Project is discussed in Draft EIR Section A.2. The suggested alternative of reconductoring the 60 kV lines along Vineyard Avenue was considered for the Draft EIR but eliminated as an alternative because it would serve area demand for a very short period of time, after which a 230 kV project would still be required (see Section B.5.4.1.3).
- 51-6 Section D of the Draft EIR describes the comparison of alternatives evaluated in the Draft EIR. The S4 Alternative was found to be environmentally inferior to the S2 Alternative (which was determined to the Environmentally Superior Alternative) because it would disturb extensive biological resources habitat, would have potentially significant visual impacts, is a longer route, and could impact California red-legged frog habitat. While none of these impacts were found to be unavoidable, there were also no unavoidable impacts identified for the S2 Alternative or the Proposed Project in the South Area.
- 51-7 The No Project Alternative in the South Area is not Environmentally Superior because, as described in Draft EIR Sections B.7 and D.4, the demand for electricity in this area is such that if this project were not built, PG&E Co. would be required to take other actions that could cause more impacts to the area than those currently proposed.
- 51-8 Please see General Response GR-4 regarding the potential for installing the S1 Alternative underground.
- 51-9 Please see Response to Comment P-2, which addresses the route described in this comment.

# COMMENT SET 52: LOIS LUTZ

52-1 The commenter's preference for the S2A Alternative and undergrounding of any routes near Sycamore Regional Park is acknowledged.

# COMMENT SET 53: BILL BERGMANN

53-1 The commenter's opposition to the S1 and L2 Alternatives is acknowledged.

## COMMENT SET 54: FORD AND MARY ROBERTS

- 54-1 Please see Response to Comment 6-1 regarding alternatives development. Draft EIR Section C.7 considered consistency of the Proposed Project and alternatives with the General Plans of each jurisdiction. See also Response to Comments 54-2 through 54-17.
- 54-2 The S4 Alternative was defined for the EIR Team on topographic maps and in field trips in which route impacts were evaluated. The route is illustrated in Draft EIR Figure B-13.
- 54-3 Selection of the Environmentally Superior Alternative involves consideration of impacts in all environmental disciplines. The S4 Alternative is not the Environmentally Superior route (the S2 Alternative was selected as Environmentally Superior).
- 54-4 Intervening ridgelines would screen the S4 Alternative from potential viewing locations in the west Vineyard Avenue and Vintage Hills areas.
- 54-5 Table B-1 of the Final EIR presents the length of each route. The impacts of increased length of each route is considered in the EIR, since a longer route would have more likelihood of affecting resources or residents.
- 54-6 The discussion of the Specific Plan on page Ap. 1-8 of the Appendix Volume of the Draft EIR does not assume that because the Specific Plan has been judged to be consistent with the General Plan, it is automatically consistent with the findings in the Land Use Policy consistency table. As stated on page Ap. 1-8, the Specific Plan does not promulgate any policies, but identifies General Plan policies relevant to the Specific Plan area. Because the General Plan policies were previously evaluated (on pages Ap. 1-6 through Ap. 1-8), there was no need to repeat those policies under the Specific Plan heading.

The analysis summarized in the Draft EIR did thoroughly evaluate the relevance of the *Vineyard Avenue Corridor Specific Plan* to the Proposed Project and alternatives, and identified an inconsistency of Alternative S2 with the Specific Plan. Impact 7-16 (page C.7-51) describes the potential impact on a future elementary school proposed in the Specific Plan area and identifies mitigation to reduce the impact to an acceptable level. Regarding the two policies cited in the comment, the analysis determined that the project and alternatives would be consistent with those policies, and provided the rationale for that determination on page Ap. 1-7; the CPUC stands by the conclusions set forth therein.

54-7 The description of the S2 route along Vineyard Avenue had an error in one segment: between the Ruby Hill fire station and the divided roadway portion of Vineyard, the transmission line would be installed <u>north</u> of the road. The south side in this area is too steep and would require extensive grading.

While the south side of Vineyard Avenue may be closer to some residences, it is not the most environmentally sensitive side of the road. The north side parallels the Arroyo del Valle riparian corridor, which serves as wildlife habitat. Mitigation Measure B-2 would first require determining whether the oaks along Vineyard Avenue are considered Heritage Trees; if they are, the mitigation measure first requires attempted avoidance of the Heritage Trees, and second, compensation for the removed trees through a Tree Replacement Plan. The S2 Alternative does cross and runs adjacent to Arroyo Del Valle; however, no significant impacts would occur as a result of any of the South Area alternatives. Note that Section B.3 of this Final EIR considers the use of New Vineyard Avenue as a variation on either the S2 or S4 Alternatives.

54-8 Nothing in the *Vineyard Avenue Corridor Specific Plan* indicates that the existing Vineyard Avenue alignment would be planted with landscaping, though the plan does call for substantial landscape planting alongside the corridor to screen new homes that would be located north and south of the corridor. The Specific Plan does indicate that the existing roadway would be converted to a pedestrian, bicyclist, and equestrian corridor. It also identifies the existing Vineyard Avenue alignment as intended to provide emergency vehicle and utility maintenance vehicle access. In this regard, the underground transmission line would be consistent with the intended utility corridor, and its construction would not remove landscaping or otherwise destroy the character of an existing neighborhood.

Regarding PG&E Co.'s right-of-way (ROW) along Vineyard Avenue, a ROW of 30 feet would be required during construction, while a permanent ROW of about 15 feet in width would be required for protection of the transmission line and periodic maintenance access. PG&E Co. would compensate affected property owners at a fair-market rate for easements for the underground alignment across private property.

54-9 Section B.3 of the Final EIR clarifies the routing of the S2/S4 Alternative along Vineyard Avenue. In the area where there is a steep slope along the southern side of the road, the transmission line was proposed to be buried to the <u>north</u> of the roadway (although Draft EIR text erroneously stated that it would be to the south in this area). Final EIR Section C.2.3 revises this alignment (based on the construction of New Vineyard Avenue) to require the transmission line to be installed within the roadway in this segment.

Issues related to existing roadway slopes and grading requirements would be covered under the applicable laws, regulations and standards of the appropriate concerned municipalities and agencies. Section C.11.1.2 page C.11-14 provides a detailed discussion of the applicable laws, regulations and standards.

- 54-10 As described in Draft EIR Section B.6.1.2, the S2 Alternative would not be installed in the middle of the street along most of its length, but along either the north or south sides of the street. Mitigation Measure S-1 (Section C.10) requires PG&E Co. to consult with local jurisdictions to identify the appropriate locations for underground cable installation when it would be located within roadways.
- 54-11 The Draft EIR evaluates impacts both on existing land uses and planned land uses that are identified in adopted planning documents or otherwise reasonably foreseeable and relatively eminent. In the area referenced by the comment, construction impacts were identified on existing residential receptors (described for the Proposed Project on pages C.7-42 through C.7-43 and referenced for Alternatives S2 and S4 in Sections C.7.3.3 and C.7.3.4, respectively) as

well as on the planned elementary school (Impact 7-16, discussed on page C.7-51). Please also see Response to Comment to 54-8.

54-12 The Draft EIR's statement, referenced in the comment, that the S2 Alternative would use an existing 60 kV transmission corridor is intended to point out the benefits of consolidating impacts in a single corridor rather than creating new utility corridors.

Regarding the comment's suggested "cumulative impact" of the 230 kV underground cable (in Alternative S2) added to the existing 60 kV power line on two sides of the planned elementary school site, please see Final EIR Section B.7. In addition, please note the following:

- As described in Draft EIR Section C.9.2.2.1, the magnetic field for the underground cable will vary from about 29 mG over the line, to about 6 mG at 15 feet away from the line (at the edge of the ROW), and less than 1 mG at 50 feet away from the line.
- While there are no federal or California standards limiting human exposure to EMFs from transmission lines, there are standards/limits adopted in New York and Florida, based on an objective of keeping the field levels from new power lines similar to those from existing lines, as discussed in Draft EIR Section C.9.2.1.1 and referenced in Draft EIR Table C.9-3. Florida is the most relevant to this case, as it has a codified limit for 230 kV (and under), which is 150 mG at the edge of the ROW. New York's limit is for lines under 125 kV greater than 1 mile long, and is 200 mG at the edge of the ROW. Both of these limits are well above the additional mG expected from the new underground 230 kV cable (about 6 mG at the edge of the ROW, 15 feet from the line), as well as the approximate "cumulative" magnetic field resulting from the addition of the 230 kV underground cable parallel to the existing 60 kV power lines.

The CPUC notes that the California State Department of Education enacted requirements in 1989 and 1993 for setbacks from electrical transmission lines for new schools. For 50-133 kV lines, school property must be at least 100 feet (30 meters) from the edge of the power line easement. For 220-230 kV lines, the distance is 150 feet (45 meters), and for 500-550 kV lines, it is 350 feet (107 meters). According to the CA Dept. of Health Services' EMF Program website, from which this information was gleaned, the rationale for this regulation was that at these distances, the *electric* field from the transmission lines would be near background levels; there was no medical risk basis for these distances. The regulation (CA Code of Regulations Sec. 14010) also provides that at the request of the governing board of a school district, the State Superintendent of Public Instruction may grant exemptions to this standard if the district can demonstrate that mitigation of specific circumstances overrides a standard without compromising a safe and supportive school environment.

The CPUC presumes that the Pleasanton Unified School District (see Comment Set L) has addressed the presence of the existing 60 kV lines along two sides of the planned Neal Elementary School site relative to this regulation. Regarding the underground 230 kV cable proposed in Alternative S2, the CPUC acknowledges that the requirements of Section 14010 would probably not be met, if the Neal School were being sited following implementation of this Alternative (and acquisition of an easement by PG&E Co. for it). As described in Response to Comment P-3, the use of the "New Vineyard Avenue" (planned north of the Neal School site) has been considered as a variation of Alternative S2; please see that Response to Comment for further information. In the absence of the "New Vineyard Avenue" variant to Alternative S2, the substantial reduction (at least 50%) of EMF strength by undergrounding the 230 kV line parallel to "Old" Vineyard Avenue provides ample mitigation in the spirit of the regulation. In addition, as stated above, Final EIR Section B.7 addresses the potential removal of the 60 kV line.

- 54-13 The Draft EIR evaluates the Proposed Project and does not identify any significant unavoidable **(Class I)** impacts associated with that route. As required by CEQA, Alternatives were identified that would reduce or eliminate impacts of the Proposed Project (i.e., the visual impacts from the Highway 84 corridor, the impacts of access road construction along the overhead portion of the route, and the construction impacts in the smaller residential areas of Pleasanton). The comparison of the Proposed Route with the Southern Area alternatives is based on the magnitude of identified impacts.
- 54-14 See Response to Comment 54-7 regarding the potential for the S2 Alternative to affect heritage trees. Mitigation Measure S-1 will allow for refinement of an alignment within the Vineyard Avenue Corridor that minimizes impacts. Note also that Final EIR Section B.3 considers the use of New Vineyard Avenue for the S2 and S4 Alternatives.
- 54-15 Note that, in response to this comment and others, the Final EIR considers use of "New Vineyard Avenue" for the narrow part of Vineyard Avenue (see Final EIR Section C.2).
- 54-16 Please see Response to Comment 54-15.
- 54-17 The potential for undergrounding the S1 Alternative along Isabel Avenue is addressed in General Response GR-4.

#### COMMENT SET 55: KENNETH AND JEAN BURTON

- 55-1 Please see General Response GR-3.
- 55-2 Please see General Response GR-1.
- 55-3 The commenter's opposition to the Proposed Route in the South Area is acknowledged. Note that the Draft EIR identified the S2 Alternative as Environmentally Superior to the Proposed Route.

#### **COMMENT SET 56: STEVE AND NANCY WIGGINTON**

56-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged.

## **COMMENT SET 57: BONNIE K. SNETHEN**

57-1 Please see General Response GR-4 regarding the S1 Alternative along Isabel Avenue.

## **COMMENT SET 58: RESIDENTS ALONG ISABEL AVENUE<sup>2</sup>**

58-1 Please see General Response GR-4 regarding the S1 Alternative along Isabel Avenue.

## COMMENT SET 59: CHARLES E. VOIGTSBERGER

- 59-1 Please see General Response GR-1.
- 59-2 Please see General Response GR-4.
- 59-3 The cost of the Proposed Project or alternatives will be considered in the CPUC's general proceeding and is not within the scope of this EIR.
- 59-4 The commenter's opposition to the S1/L2 Alternative and preference for the S4/S2 Alternative are acknowledged. Please see General Response GR-4 regarding undergrounding along Isabel Avenue.

## COMMENT SET 60: PATRICIA CURTIN OF GAGEN, MCCOY, MCMAHON & ARMSTRONG REPRESENTING THE CROSBY FAMILY TRUSTS

- 60-1 Please see General Response GR-3 regarding the potential impacts of transmission lines on The commenter is correct that the Proposed Project would involve property values. construction of an overhead 230 kV transmission line south of and parallel to Manning Road. This would be within an existing, vacant 75-foot right-of-way (ROW) that PG&E Co. has owned for many years. The PG&E Co. ROW is marked with signs visible from North Livermore Road, near the corner of Manning Road, and is assumed to be recorded on County ownership records related to the commenter's property. The Draft EIR acknowledges the significant visual impacts of the Proposed Project and the Proposed Livermore Substation in this area, and presents several alternatives (including the L1 and L2 Alternatives) to those components of the Proposed Project. Note that the Draft EIR (Section D) concludes that the No Project Alternative is Environmentally Superior to any "build" alternative in the North Livermore area. However, the conclusion of the Draft EIR is that the Environmentally Superior "build" Alternative is the Proposed North Livermore Substation with an underground transmission line route to the east (not using the Manning Road corridor).
- 60-2 As explained in Response to Comment 60-1 and as correctly illustrated in Figure C.12-16B, the Proposed Project route would be south of and parallel to Manning Road, in the marked, existing PG&E Co. easement.
- 60-3 PG&E Co. owns an existing easement parallel to and south of Manning Road, but not along North Livermore Avenue where the Proposed Route would connect to the Proposed North

<sup>&</sup>lt;sup>2</sup> Daniel Perkins, Robert Strain, Scott Evers, Robert Nafzinger, Jim Sandstrom, Harlen Teetsel, Jerry Atwell, James Carley, Jeannine Bergmann, William Bergmann, Edward LaPlante, Gianna Evers, Karen Northrop, Pete Northrop, Anita Martin, David Martin, Joanne Jerome, Lynnette Jerome, Dianne Jerome, Jeff Jerome, C.L. Nannetti, Gina Higgins, Kirt Higgins, Edward Xavier, J.F. Carley, Kevin Mould, Mitsuka Mould, Nick Dunn, Mike Riehl, Pamela Lynch, Richard Hogan, Irene Hogan, Josh Rocse, Bill Geyer, L. Michelle Geyer, Mike Geyer, Dianna Geyer, Dee Albright, Harold Richards, John LaBrie, C.J. Vers, Gerald Johnson, John Cota, Justin McCraw, Elen Johnson, Karen Strain, Brian O'Connor, James Dremalas, Richard Roy, Debra Post, Tonja Eaton, Susan Unterreiner, Siv Hoffman, Al Hoffman, Kathy Campbell, Mike Campbell, Patricia Gray, Todd J. Gray, Linda Harper, Kris Bidwell, Brad Bidwell, Judy Xavier, Joanne J.V. Madonado, Anthony Maldonado, Lisa Magdaleno, Andrew Maldonado and Joanne Velarde

Livermore Substation. As described in Draft EIR Section B.2.2.2, PG&E Co. would need to acquire about 25 additional feet of right-of-way beyond the 75 feet it already owns. The overhead lines proposed by PG&E Co. would be located in the center of the easement.

- 60-4 The existing distribution lines would not be affected by the Proposed Project. Distribution lines can be moved underground through a process defined in the CPUC's Rule 20 which calls for undergrounding cost to be paid by the landowner, developer, or local jurisdiction.
- 60-5 Draft EIR Figure B-4 illustrates the type of transition station that would be located at the intersection of North Livermore Avenue and Manning Road in the P1 Alternative. The exact location of the station (approximately ½acre in size) would be determined by PG&E Co.'s design engineers, but it would most likely be located immediately southwest of the intersection of Manning Road and North Livermore Avenue. The impact of the transition stations (primarily visual) is included in the analysis of the P1 and P2 Alternatives the P1 Alternative would not eliminate the significant visual impact of the Proposed Route parallel to Manning Road.
- 60-6 See Response to Comment 60-4.
- 60-7 The easement for the underground transmission line in the P1 Alternative would be about 40 feet wide. Again, note that the Draft EIR determined that the P3 Alternative would be Environmentally Superior to this route.
- 60-8 See Response to Comment 60-4.
- 60-9 The easement for the underground transmission line in the P2 Alternative would be about 40 feet wide. Again, note that the Draft EIR determined that the P3 Alternative (following May School Road) would be environmentally superior to this route.
- 60-10 Uses of land within a PG&E Co. easement would have to be negotiated with PG&E Co.. Undeveloped land uses (such as grazing or golf courses) may be allowed over an underground line or below an overhead line. There is no restriction to land uses adjacent to a substation (many existing substations are located within residential areas), although there is some noise associated with substation operation so adjacent uses should be designed to minimize this impact.
- 60-11 The development plan referenced in the comment represents a developer's proposal that has not been approved and is not identified on the land use map for Zone B (the area in which the proposed golf course would be located) in the *North Livermore Specific Plan*. As noted in the Draft EIR, the *North Livermore Specific Plan* itself is not an adopted plan, and consistency with the plan was evaluated as a courtesy more than as a requirement of CEQA. CEQA does not require the evaluation of potential land use conflicts with future, speculative land uses.

Regarding Alternative P2's location within the scenic corridor of County-designated Scenic Routes, the substation would be set back from the roadway and screened by an earthen berm and landscaping. It would not obstruct views of the surrounding scenic areas, nor would it be visually incompatible with the scenic qualities of the area. While County policy discourages overhead transmission lines and towers within rural Scenic Route corridors, it does not prohibit or discourage development such as the proposed enclosed substation.

H-71

- 60-12 The commenter is correct with respect to the visual impacts of the Proposed Project in comparison with the L1 and L2 Alternatives. However, as described in Draft EIR Table D-2, these alternatives have greater impacts in many other environmental disciplines and are therefore found to be inferior to the Proposed North Livermore Substation with the P3 Alternative transmission line route.
- 60-13 The Draft EIR identifies two impacts on cattle grazing, one related to construction disruption and the other to loss of productive land, on pages C.7-44 through C.7-45. Section C.7.5.1.1 notes that the construction impact would also apply to the North Livermore area. Section C.7.5.1.2 is hereby revised to read as follows (page C.7-56):

# "C.7.5.1.2 Operation and Maintenance

The operational impact related to the loss of grazing land identified for the Proposed Project in the Pleasanton area would apply equally to the project in the North Livermore area, and would apply to land used for hay production as well as cattle grazing. In addition, the following impacts would be unique to the North Livermore portion of the project:"

- 60-14 The five-acre substation size is the size of the fenced parcel within which the substation equipment would be located. There is no required setback outside of the fence line, although, as stated in Response to Comment 60-10, developers would be wise to consider the operational impacts of substations (e.g., noise, lights) in designing adjacent land uses.
- 60-15 The Crosby property is currently occupied by agricultural fields. Please see Response to Comments 60-11 and 60-13.
- 60-16 Approved, planned land uses are addressed in Section C.7 of the Draft EIR. The noise impact analysis of necessity must focus on existing sensitive receptors. There are some exceptions to this general approach to impact assessment for particularly sensitive pending receptors, such as hospitals and schools.
- 60-17 Public health and safety impacts are discussed in detail in Draft EIR Section C.9. These issues apply to the Proposed Project and all alternatives. See also General Responses G-1 and G-2.
- 60-18 Comment acknowledged.
- 60-19 Visual Resources Section C.12.5.1.4 and the Visual Analysis Summary presented as Table C.12-6 both state that the visual impact resulting from the North Livermore Substation would be significant and unavoidable. Also, it is the responsibility of the CPUC to ensure that all necessary mitigation measures identified in the EIR are effectively implemented as proposed; see Final EIR Section F.
- 60-20 See General Response GR-3 regarding property value impacts and Response to Comment 60-1 regarding the Environmentally Superior Alternatives in the North Livermore area.

# COMMENT SET 61: ADRIENNE AND JOHN POTTER

61-1 Regarding the concerns about flights approaching Livermore Airport, please see Responses to Comments A-3 and A-16. Regarding EMFs, please see General Response GR-1. The commenter's opposition to Alternative D1 is acknowledged and will be considered by the
decision-makers prior to deciding whether or not to approve the Proposed Project or one of the alternatives.

- 61-2 Please see General Response GR-1.
- 61-3 See the Draft EIR discussion of bird electrocution under C.3.2.5.2, *Wildlife*.

#### COMMENT SET 62: RICHARD F. WARD

62-1 The comment states that the executive summary "is incomplete in that it does not mention or discuss the presence of the Greenville Earthquake Fault in the immediate area proposed for a portion of the Phase 2 project." The Draft EIR executive summary states "components of the San Andreas fault system in the San Francisco Bay region include the San Andreas, … and Greenville faults." (Draft EIR, Executive Summary, Section 4.5, page ES-16) The summary also states "[s]urface rupture comprises a minor earthquake hazard for above (ground) fault crossings of the active Greenville, Las Positas, Pleasanton, and Verona faults." (Id.)

Section C.5 of the Draft EIR also states" [t]he Proposed Phase 2 route crosses the active Greenville fault and its associated Alquist-Priolo Earthquake Fault Zone from approximately Mileposts B9.4 to B10.4 (CDMG, 1982a,b). Multiple fault traces have been mapped within the fault zone." (Section C.5.1.3.5, page C.5-15). The applicant has proposed performing geotechnical investigations at the tower foundation sites to avoid the potential for surface fault rupture beneath a tower, and to design the overhead power line to withstand surface displacement in the event of fault rupture.

These considerations were taken into account when reviewing the different segments of the "Environmentally Superior Alternative", which does not include this segment of the Proposed Project.

- 62-2 Please see Response to Comment PPH-13.
- 62-3 Transmission lines exist over and through landfills and there are no operational safety issues associated with their presence in these locations. Methane gas is produced at landfills and for most is actually collected and flared. Methane concentrations in the air around landfills is below any level that could produce a hazard for electric power lines. By way of comparison, methane in the air at concentrations that would be of concern for a power line over 20 feet above ground would mean that concentrations near the ground would be so high that they would necessitate eliminating any public presence or vehicle presence. In short if people or cars can be in the areas where the poles would be, there would not be a hazard from the line. There can be a concern with construction of lines <u>in landfills</u> because excavation in areas with methane gas pockets could spark a fire or where there would be worker hazards in excavations with collected gas pockets.
- 62-4 The commenter's support for the Switching Station as the Environmentally Superior Phase 2 Alternative is acknowledged. The Switching Station Alternative would eliminate <u>all</u> of the impacts associated with the Proposed Phase 2 Route.
- 62-5 The purpose of Section B.2.2.4 was not to describe existing land uses along the alignment, but rather to provide a brief overview of the components of Phase 2 of the Proposed Project. More details of the project are provided in Sections B.3 and B.4. Existing land uses along the proposed and alternative alignments and on the proposed and alternative substation sites are

described in Section C.7.1.1, and frequent reference to residences, including isolated rural residences, is made throughout this section. In the discussion of land use impacts (Section C.7.2), impacts to residences are repeatedly cited. Two general impacts (Impacts 7-1 and 7-2) are described for the Pleasanton Area in Section C.7.3.1; these impacts are subsequently referenced in individual discussions of area alternatives (see, for example, Section C.7.5.1.1).

- 62-6 The correct name of the landfill owner (Republic Services Group) is acknowledged. The relocation of the Phase 2 route referenced by the commenter in the vicinity of the landfill was made by PG&E Co. prior to their submittal of their application to the CPUC. Therefore, the route considered in the Draft EIR is the revised route.
- 62-7 The commenter is correct that the Draft EIR identified several alternatives to the Proposed Phase 2 route that completely avoid the landfill area. These alternatives include the Stanislaus Corridor Alternative and the three Switching Station Alternative sites. The fact that the Draft EIR considers alternative routes does not eliminate the Proposed Phase 2 route from consideration. The CPUC has the authority to select and approve any route (proposed or alternative) that is evaluated in the EIR. The EIR evaluates many impacts associated with the Proposed Phase 2 route, as summarized in the Impact Summary Tables at the end of the Draft EIR's Executive Summary.
- 62-8 The Brushy Peak Alternative as described in the Draft would have replaced a small portion of the Proposed Phase 2 route. The remainder of the Proposed Phase 2 route would not change and is fully evaluated in the Draft EIR. Note that the Brushy Peak Alternative has been eliminated from EIR consideration (see Final EIR Section B.6).
- 62-9 Section C.7.1.1.4 notes that the easement passes to the south of an existing residence just prior to (i.e., east of) the Vasco Road crossing, along the western border of Vasco Road Landfill. There are four other rural residences south of the Phase 2 alignment in the vicinity of the western/southern borders of the landfill. These additional residences were not specifically mentioned in the Draft EIR due to their distance from the alignment. The closest is about 500 feet southwest of the alignment, while the others range between approximately 1,000 and 2,000 feet from the alignment. These more distant residences would not be significantly affected by construction noise, in some cases being substantially screened by topography. Nonetheless, some of them would experience some noise during the erection of Phase 2 support towers. Given the existing noise from adjacent landfill operations, it is likely that residents would not notice a substantial qualitative or quantitative difference in ambient noise. However, to acknowledge that a limited number of residences would also be affected by construction of the Phase 2 alignment, the Draft EIR is hereby revised as follows (page C.7-61):

# "C.7.6.1.1 Construction

The temporary construction disturbance of grazing cattle identified for the proposed south alignment would also occur during Phase 2 construction. Although there would be no need to construct new access roads for the construction of Phase 2, there would a laydown area located in the vicinity of Milepost C5 and five pull-and-tension sites would be located along the Phase 2 alignment. As with the South Alignment, the amount of land that would be temporarily removed from grazing would be miniscule relative to the total amount of grazing land in the area. No mitigation would be required for this Class III impact. In addition, the noise and dust impacts on residential receptors identified for the South Area project alignment would also apply to a limited number of residents along the Phase 2 alignment, and the same measures

(Mitigation Measures L-1 and L-2) would be recommended to reduce the severity of the impacts. No other construction impacts have been identified for the Phase 2 alignment."

Regarding the Greenville fault, while the Phase 2 route crosses the fault, no support towers would be constructed on the fault itself. As discussed in Impact 5-6, pages C.5-28 through C.5-29 of the Draft EIR, site-specific geotechnical investigations for tower locations along the alignment would evaluate the potential for surface rupture and relocate towers where significant potential for surface rupture is identified.

- 62-10 The commenter's support of the Switching Station Alternative as Environmentally Superior to the Proposed Phase 2 route is acknowledged. However, as stated in Response to Comment 62-7, the CPUC may legally select any route evaluated in the EIR (including the Proposed Phase 2 route).
- 62-11 The safety issues raised by this commenter are addressed in Response to Comments 62-1 to 62-3.
- 62-12 The table of the Draft EIR referred to in the comment, is a summary of the applicant proposed measures and states that the "Greenville Fault (is a) [h]istorically active fault," that "geotechnical investigations at tower foundation sites to locate and avoid potential for surface fault rupture" will be performed, and that the applicant will "design transmission lines to accommodate potential fault displacement." (Table C.5-2 Applicant Proposed Measures, Section C.5.2.2, page C.5-26.) The exact location of transmission line towers is to be adjusted to avoid construction over surface fault ruptures. The Proposed Phase 2 route, if approved for construction, would cross the Greenville fault zone, and tower structures would be placed within the Alquist-Priolo Earthquake Fault Zone established for the Greenville fault.

The Draft EIR states" [t]he (Tri-Valley) area was also subject to strong ground motion from the Livermore earthquake sequence of January 24-26, 1980. The two largest of these earthquakes had magnitudes of M5.7 and M5.2, respectively, and produced as much as 5 centimeters of surface offset over a discontinuous surface rupture of 6 kilometers" (Section C.5.1.3, Page C.5-9).

See also Response to Comment 62-1.

- 62-13 Please see Response to Comment 62-9.
- 62-14 Section C.9 of the Draft EIR addresses health and safety impacts for all aspects of the Proposed Project and alternatives. Rural residents would be affected in similar manner as residents of more populated areas.
- 62-15 The crossing of North Vasco Road is shown in Draft EIR Table C.11-1 (Proposed Phase 1: North Area), at page C.11-2. The crossing of North Vasco Road with transmission lines will require an encroachment permit and will be addressed by PG&E Co. in a transportation management plan prior to any construction activity in the area. As noted in Draft EIR Section C.11.5.1.1, the application of Mitigation Measures 1 through 5, and 8 should reduce potential impacts to a less than significant impact.
- 62-16 Visual Resources Sections C.12.5.1.5, C.12.6.1.2, and C.12.6.2 identify the significant visual impacts that would occur to rural residents in the North Livermore area.

#### COMMENT SET 63: RICHARD CARROLL

63-1 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged. Please see General Responses GR-1 and GR-2 regarding EMF and 230 kV underground technology, respectively.

# COMMENT SET 64: MATTHEW AND KAREN BERRY

- 64-1 Please see General Response GR-4.
- 64-2 Please see General Response GR-4. Also, with respect to the referenced simulation presented as Visual Resources Figure C.12-5, the transmission tower positioned in the center of the simulation is actually quite far down Isabel Avenue and is located approximately across from the sixth to seventh wood pole on the east side of Isabel Avenue. The simulated structure height is approximately 125 feet tall.
- 64-3 Please refer to General Response GR-4.
- 64-4 Please see General Response GR-4.
- 64-5 Benedict Court, Smallwood Court, and Hearst Drive (a total of approximately one mile) are all dead-end streets providing access only to the residences on these and adjacent streets. Construction impacts in these streets (where no bypass routes are available for homeowners living on them and no multiple lanes exist for easy traffic flow) would be greater than impacts in wider streets with multiple lanes and/or shoulders. Bernal Avenue is a divided road and more heavily traveled, comparable to Isabel Avenue in Livermore.
- 64-6 The S3 Alternative was eliminated because of the terrain west of the Ruby Hill development, which has been graded such that only very steep slopes remain along its western border. An underground transmission line could not be constructed in this terrain, and an overhead route would have significant visual impacts from Livermore and the southeast corner of Pleasanton.
- 64-6 The S3 Alternative followed the route of PG&E Co.'s proposed route from its 1988 application, so this route was evaluated during scoping for this EIR. Because of extensive grading that has now been completed around the western side of the Ruby Hill development, it is no longer feasible to install an underground transmission line along that route, and an overhead route would have greater visual impacts than the Proposed Route. This description should have been included in Draft EIR Section B.5.4 (Alternatives Eliminated from Further Consideration), but was inadvertently omitted.

# COMMENT SET 65: CHRISTOPHER R. O'BRIEN

65-1 The commenter accurately summarizes the Draft EIR's conclusions regarding the North Livermore area. The P3 Alternative was determined in the Draft EIR to be the Environmentally Superior "build" Alternative (the No Project Alternative was considered to be superior overall). The comparative length of these project components was a factor in the comparison of their environmental impacts. However, the cost of the project is not evaluated in the EIR; that aspect of the project is considered in the CPUC's General Proceeding by the Administrative Law Judge responsible for advising the CPUC on the project as a whole (see Draft EIR Section A.1).

- 65-2 The commenter's preference for the No Project Alternative in the North Livermore area is acknowledged, and is in agreement with the conclusions of the Draft EIR.
- 65-3 The commenter's support for alternatives to the Proposed Project is acknowledged.

# COMMENT SET 66: JAMES AND DIANE BELAK

- 66-1 Please see General Response GR-4.
- 66-2 The alternatives evaluated in the Draft EIR were developed by EIR preparers with input from all local jurisdictions (including the City of Livermore) and were not developed by residents of Pleasanton. Please see also General Response GR-5 regarding the provision of the electric power of this project to one jurisdiction versus another.
- 66-3 The commenter's preference for the Proposed Project in Pleasanton is acknowledged.

### COMMENT SET 67: J. CHRISTIAN TRUEBRIDGE (SHAPELL INDUSTRIES OF NORTHERN CALIFORNIA)

- 67-1 The CPUC acknowledges the commenter's opinion that the project is urgently needed to serve the Tri-Valley area.
- 67-2 Potential impacts to residential receptors and other future uses along the D2 Alternative alignment are addressed in Section C.7.4.3 of the Draft EIR. CEQA does not require an analysis of strictly economic effects such as an influence on home sales. Please see General Response GR-3 and Response to Comment N-9. The commenter's objection to Alternative D2 is acknowledged and will be considered by the decision-makers prior to deciding whether or not to approve the Proposed Project or one of the alternatives.
- 67-3 There are several impacts associated with PG&E Co.'s Proposed Route to the Dublin Substation, including the visual impacts of the transmission line across North Livermore and in the vicinity of Manning Road west of North Livermore Road. These impacts are avoidable only by construction of alternatives that would need to be installed underground (e.g., the P1/P2 Alternatives or Mitigation Measure V-3), and these alternatives are more expensive and could be more time-consuming than PG&E Co.'s proposal.

# COMMENT SET 68: STEVE BROZOSKY

- 68-1 The CPUC and EIR preparers met with City of Pleasanton staff and representatives of homeowners groups in the spring of 2000 to discuss potential alternative routes in this area. Some EIR alternatives resulted from these discussions; other alternatives were determined to be infeasible and are addressed in Draft EIR Section B.5. Please see General Response GR-4 regarding Isabel Avenue concerns.
- 68-2 The Vineyard Avenue Corridor Specific Plan and the planned Neal Elementary School was addressed in the Draft EIR for several issue areas, including Land Use and Recreation (Section C.7.3.3), Noise (Section C.8.3.3), and Transportation (Section C.11.3.3). Table E.3-1 of the Draft EIR lists potential or existing projects planned in the City of Pleasanton, one of which is the Vineyard Avenue Specific Plan. The Specific Plan is identified to include a subdivision, school, trail, park, and road realignment. The cumulative impacts of these projects are analyzed by discipline in section E.4 of the Draft EIR. Please see General Response GR-1 regarding EMF and safety, as well as Response to Comment 54-12.

Due to concerns about Alternative S2's routing of an underground 230 kV cable past the planned Neal Elementary School, the use of the "New Vineyard Avenue" (planned north of the Neal School site) has been considered as a variation of Alternative S-2; please see Final EIR Section B.3 and Response to Comment P-3.

- 68-3 Please refer to Responses to Comments PPH-66 and P-3.
- 68-4 Please refer to Responses to Comments PPH-66 and P-3.
- 68-5 Please see Responses to Comment P-3.
- 68-6 Please see General Response GR-4 and Response to Comment P-3.

### COMMENT SET 69: LOU ASTBURY

69-1 The commenter's opposition to the Proposed Project and Environmentally Superior route in Pleasanton are acknowledged. Please also see General Response GR-1 regarding EMF and General Response GR-2 regarding 230 kV underground technology.

### COMMENT SET 70: ROBERT RUSSMAN

- 70-1 Please see General Response GR-2.
- 70-2 Please see General Response GR-4.

### COMMENT SET 71: MICHAEL WENDT

71-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please see General Response GR-4 regarding undergrounding along Isabel Avenue.

# COMMENT SET 72: LELAND COLLINS

72-1 The commenter's preference for placing the transmission lines underground in Pleasanton is acknowledged.

#### COMMENT SET 73: LAURA HADLEY

73-1 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged. Please see General Response GR-1 regarding EMF.

#### COMMENT SET 74: BRIAN J. CROSS

74-1 The commenter's opposition to the S1 Alternative and preference for the Proposed Project in Pleasanton are acknowledged.

#### COMMENT SET 75: KAREN AND BRIAN HERNANDEZ

75-1 The commenter's opposition to the S1 Alternative and preference for the Proposed Project in Pleasanton are acknowledged. Please see General Response GR-1 regarding EMF.

#### COMMENT SET 76: THERESA REGAN

76-1 The commenter's opposition to the Proposed Project along Benedict Court and Hearst Drive and preference for alternative routes along Stanley Boulevard and Vineyard Avenue are acknowledged.

### **COMMENT SET 77: JANICE SMITH**

77-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and Stanley Boulevard are acknowledged.

# COMMENT SET 78: MARTIN INDERBITZEN (LIN FAMILY)

- 78-1 The commenter's opposition to the Proposed Project and preference for the S4 Alternative without placing any towers on the commenter's property in Pleasanton are acknowledged.
- 78-2 PG&E Co.'s statement in its opening testimony is not consistent with EIR conclusions regarding the impacts of the S4 Alternative (which the EIR found to have greater impacts than both the Proposed Project and the S2 Alternative). The Final EIR evaluates the S5 (Quarry Route) Alternative in Sections B.4 and C.3 and considers the use of "New Vineyard Avenue" in Sections B.3 and C.2. Section D of the Final EIR compares these route segments, in combination with the S2 and S4 Alternatives, to the Proposed Project and the original S2 and S4 Alternatives addressed in the Draft EIR.

#### COMMENT SET 79: PATTY AND TONY RECUPERO

79-1 The commenter's opposition to the S1 Alternative along Isabel Avenue and Stanley Boulevard is acknowledged. Please see General Response GR-4.

#### COMMENT SET 80: MICHELLE ANTILLA

- 80-1 Please see General Responses GR-1 and GR-2 regarding EMF and 230 kV undergrounding technology, respectively.
- 80-2 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-4 regarding undergrounding along Isabel Avenue.

#### COMMENT SET 81: DIANE KELLER

- 81-1 Please see General Response GR-2.
- 81-2 Please see General Response GR-1.
- 81-3 Please see General Response GR-2.
- 81-4 The Proposed Project or an alternative is urgently required in the immediate future to increase the service capacity of the Vineyard Substation. As explained in Draft EIR Section G, the CPUC's CEQA process has included substantial opportunity for public involvement in the process of evaluation of PG&E Co.'s Proposed Project and alternatives.

#### **COMMENT SET 82: LARRY GOSSELIN**

- 82-1 Views of the project from Collier Canyon Road and Doolan Road are more limited than the open panoramic views from Carneal Road. Also, the view duration from Collier Canyon Road and Doolan Road would be relatively brief since the route passes perpendicular to the roads and views of the project would be limited primarily to the conductors spanning the canyons. In contrast, the route travels parallel to Carneal Road, resulting in more project viewing opportunities with longer view durations. The views from Carneal Road would encompass both towers and conductors in a landscape with few built structures. Thus, the actual visual impact that would be experienced on either Doolan Road or Collier Canyon Road would be less than that experienced from Carneal Road. However, the commentator is correct in asserting that Collier Canyon Road and Doolan Road are Alameda County designated Scenic Routes. Specifically, the Proposed Project would be inconsistent with the governing policy statement of the Scenic Route Element that states: "New overhead transmission towers and lines should not be located within scenic corridors when it is feasible to locate them elsewhere." Policy inconsistency (criterion #5 Visual Resources Section C.12.2.2, page C.12-21 of the Draft EIR) is identified as a circumstance potentially leading to a finding of a significant impact (depending on the language of the policy and the extent of project consistency or inconsistency). The Proposed Project's inconsistency with the Scenic Route Element would be considered a significant and unavoidable (Class I) visual impact. However, the finding of a significant visual impact at the Doolan Road and Collier Canyon Road crossings, based on the project's inconsistency with the County Scenic Route designation, does not change the original conclusion presented in the Draft EIR that the Proposed Project would result in significant and unavoidable (Class I) visual impacts throughout the North Livermore area.
- 82-2 The Draft EIR addresses Measure D on pages C.7-37 to C.7-39 and in Section E.1.2. Measure D does not regulate installation of transmission lines since the CPUC's authority supercedes local jurisdictions for these projects.
- 82-3 The commenter's preference for the Environmentally Superior Project is acknowledged.
- 82-4 The EIR acknowledges that PG&E Co.'s existing 75-foot wide easements across the North Area would need to be expanded by about 25 feet to accommodate the required right-of-way width for 230 kV lines. The Draft EIR also identifies several significant visual impacts associated with the North Area portion of the project (see Section C.12.5).

#### COMMENT SET 83: RITA SUN

- 83-1 Please see General Response GR-4.
- 83-2 Please see General Response GR-1.
- 83-3 Please see General Response GR-4.
- 83-4 Please refer to General Response GR-4.
- 83-5 Consolidation of existing utility corridors is a basic planning principle for reducing impact and this EIR has sought alternatives that would follow that principle. The Stanislaus Corridor is currently occupied by a pair of lattice-type transmission structures along its entire length. Therefore, it is an existing and disturbed corridor with a baseline of current visual and land use impacts. The Proposed 230 kV route (overhead in the South Area and in the North Area)

would be installed in currently undisturbed areas with no existing transmission line or other overhead utility structures.

#### COMMENT SET 84: ERIC AND MICHAELE WEASNER

- 84-1 Please see General Response GR-3.
- 84-2 Please see Response to Comment A-16.
- 84-3 Please see Response to Comment A-3, and General Response GR-4. Impacts along Vineyard Avenue are addressed in the Draft EIR on pages C.7-46 (Impact 7-8), C.7-50 (Impact 7-15), and C.7-51 (Impact 7-16).
- 84-4 The temporary impacts to traffic circulation on City of Livermore roads are addressed throughout the Draft EIR. In particular, the impacts related to Alternatives S1, S2, L1 and L2 are described on pages C.11-24-31. Mitigation measures proposed to lessen the project temporary impacts to Livermore roads are also described in the same section.
- 84-5 Please see General Response GR-1 regarding EMF exposure.

#### **COMMENT SET 85: JOHN VASHON**

- 85-1 The commenter's opposition to the S1 Alternative is acknowledged.
- 85-2 Please see General Response GR-4.
- 85-3 Please see Response to Comment 11-9 regarding public involvement/notification.

#### **COMMENT SET 86: NANCY RICHARDS**

- 86-1 Please see General Response GR-1.
- 86-2 Please refer to General Response GR-4.
- 86-3 Please see General Response GR-4.
- 86-4 Please see General Response GR-3.
- 86-5 The S1 Alternative along Isabel Avenue would be over 200 feet from the backyards of any residences, as it would be located along the west side of Isabel Avenue which is soon to be expanded to a four-lane expressway. Please see General Response GR-4 regarding other Isabel Avenue issues.

#### **COMMENT SET 87: BRIAN TRAYNOR**

- 87-1 Please see General Response GR-1.
- 87-2 The commenter's opposition to the Proposed Route through Pleasanton is acknowledged. Based on CEQA requirements, EIR analysis focuses on existing conditions, and on potential cumulative impacts of projects approved at the time the Notice of Preparation is issued (in this case, April 2000). Therefore, while future development in the Vineyard Corridor is

acknowledged, the impacts on existing resources and residences are generally give more weight in EIR analysis.

87-3 The commenter's opposition to the Proposed Route is acknowledged.

# COMMENT SET 88: WILLIAM M. SCHADEGG

- 88-1 The commenter's opposition to the Proposed Project and preference for the Environmental Superior Project in Pleasanton are acknowledged.
- 88-2 The commenter suggests deeper burial as mitigation for potential EMF impacts. Please see General Response GR-1 in which it is explained that an underground transmission line would have EMF levels comparable to those found in a normal household.
- 88-3 As explained in Draft EIR Section B.5.4.1.8, the underground route along Isabel Avenue was rejected not because of cost but because of permitting constraints (Caltrans) and feasibility (lack of room west of the roadway to safely construct the line). See also General Response GR-4.
- 88-4 The construction impacts of the Proposed Project are identified in Draft EIR Sections C.2 (Air Quality), C.5 (Geology and Soils), C.6 (Land Use and Recreation), C.8 (Noise), C.9 (Public Health, Safety, and Nuisance), C.10 (Socioeconomics), and C.11 (Transportation and Traffic). While these impacts would cause disturbance in the neighborhood, they are short-term in comparison to the life of the project. Construction impacts would be reduced through the implementation of over 50 mitigation measures recommended in the EIR.
- 88-5 Please see General Response GR-1.
- 88-6 Please see General Response GR-2.
- 88-7 Please see General Response GR-2.
- 88-8 Potential fire hazards of the project are addressed in Draft EIR Section C.9.1.3, under the subheading "Wind, Earthquake and Fire Hazards." Fires caused by overhead transmission lines are not considered to be a significant impact. Heat from underground lines is reduced by the thermal backfill used to fill in the trench, and by the pavement covering the trench in a street. A 230 kV underground transmission line will generate heat that dissipates into the surrounding ground. Analysis indicates that the maximum surface warming to be expected is on the order of one to two degrees, below the threshold where one could detect the difference in temperature by touch. After a rain, steam often rises from streets whether or not it has underground cables.
- 88-9 This comment addresses localized high ground water elevations beneath the road surface at 4106 Casterson Court in Pleasanton. The comment suggests that high ground water conditions may also occur along the path of the Proposed underground route down Hearst Drive. This potential issue is addressed in Impact 6-8 and Mitigation Measure H-6 of the Draft EIR. Mitigation Measure H-6 recommended testing groundwater conditions south of Arroyo Valle at 500-foot intervals. Mitigation Measure H-6 would also include groundwater testing in the area of question along Hearst Drive and down Bernal Drive towards Arroyo Valle.

Impact 6-8 states:

"... Shallow groundwater depths are not expected for the upland areas along most of the Proposed Underground Route, but nearer to the Arroyo Valle crossing, shallower groundwater depths may be experienced depending upon runoff/recharge conditions and water surface elevations in the creek. ..."

Mitigation Measure H-6 states:

"Groundwater levels along the underground transmission line shall be tested by drilling pilot borings. The location, distribution, or frequency of such tests shall be determined to give adequate representation of the conditions along the underground line. For example, along the route south of Arroyo Valle, tests could be conducted at four locations at 500-foot intervals..."

- 88-10 Please refer to Section C.8.3.1.1 for project construction noise impacts that could occur in the Pleasanton area. Underground transmission lines do not emit corona noise as overhead transmission lines do.
- 88-11 The transmission line through Kottinger Ranch would be buried approximately 6 feet deep and would be shielded and encased in a concrete vault. There would be no reason why children could not safely play on the streets above the alignment, other than the obvious concern of traffic safety. Please see General Response to GR-1 for a discussion on the health effects of EMFs.
- 88-12 Section C.9 addresses interference and nuisance impacts in Section C.9.1.2 (Radio/Television/ Electronic Equipment Interference) and Section C.9.2.2.2, and Mitigation Measure PS-2 is recommended to ensure that interference is addressed by PG&E Co..
- 88-13 Please see General Responses GR-1 and GR-2, addressing EMF and safety issues related to the Proposed Project and alternatives.
- 88-14 The purpose of an EIR is to document the environmental impacts associated with a Proposed Project so that decisionmakers can make informed decisions about project approval. The CPUC requires that PG&E Co. communicate its intention to construct a new project to the local jurisdictions along the route, and PG&E Co. has documented its completion of this consultation, which began in 1997 and continued through 1999 when the application was submitted. This outreach is documented in PG&E Co.'s Proponent's Environmental Assessment (Appendix C), which is available at local libraries in the Tri-Valley area. Separate from that process, the CPUC's compliance with CEQA has involved a comprehensive public involvement process that is detailed in Final EIR Section G.
- 88-15 The cumulative impacts of potential and existing projects within proximity of the Proposed Project or alternatives are discussed in Section E (Other CEQA Considerations) of the Draft EIR. Each discipline analyzes the cumulative impacts of the projects listed in Table E.3-1. For example, see Section E.4.1 cumulative impact analysis of air quality.
- 88-16 The background information on the Kottinger Ranch Development in Pleasanton is acknowledged.
- 88-17 Please see General Response GR-1.
- 88-18 Please see General Response GR-3.

88-19 Several of the issues listed by the commenter are addressed thoroughly in the EIR (visual impacts, safety, recreation), but other issues are beyond the scope of EIR analysis (psychological burden, financial loss). These issues may be considered by the CPUC in the General Proceeding as a part of its consideration of "community values" in the General Proceeding

### COMMENT SET 89: TIM M. LARIN

89-1 The commenter's opposition to the D2 Alternative in Dublin/Dan Ramon is acknowledged.

#### COMMENT SET 90: JOHN AND KIM CALLAHAN

90-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please also see General Response GR-4.

### COMMENT SET 91: SIV HOFFMAN

91-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please also General Response GR-1 regarding EMF.

### COMMENT SET 92: CLAIRE LEIBOWITZ

- 92-1 The commenter's opposition to any routes within residential areas is acknowledged. Please see General Response GR-1 regarding EMF.
- 92-2 The Final EIR describes an underground transmission line route along "New Vineyard Avenue" in Section B.3. The *Vineyard Avenue Corridor Specific Plan* is addressed on page C.7-31 of the Draft EIR. A potential construction impact on the planned school (Impact 7-16) is identified in Section C.7.3.3 and Mitigation Measure L-12 is recommended to reduce the impact to a less-than-significant level. Please also see Responses to Comments PPH-114, 54-6, and 54-8. The commenter's opposition to Alternatives S2 and S4 is acknowledged and will be considered by the decision-makers prior to deciding whether or not to approve the Proposed Project or one of the alternatives.
- 92-3 Please see General Response GR-2.

#### COMMENT SET 93: CAROLYN AND MARK MASON

93-1 The commenter's opposition to the D2 Alternative in San Ramon is acknowledged.

#### COMMENT SET 94: MR. & MRS. DON BRIEMLE

94-1 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please also see General Response GR-4 regarding undergrounding along Isabel Avenue.

#### COMMENT SET 95: DANA CONTE

- 95-1 Please see General Response GR-1.
- 95-2 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

### COMMENT SET 96: LINDA THERP

96-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

### COMMENT SET 97: ROY E. KRAUSCH

97-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

#### COMMENT SET 98: GEORGE GRAMAGLIA

98-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

### **COMMENT SET 99: SHARON GRAMAGLIA**

99-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

### COMMENT SET 100: NECITA AND HERALD SMITH

100-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

### COMMENT SET 101: TED BOLLS

101-1 The commenter's preference for the S1 Alternative is acknowledged. Please also see General Response GR-1 regarding EMF.

#### COMMENT SET 102: JEFF HASLAN

102-1 The discussion of Alternative L1 on page C.7-11 of the Draft EIR notes that the Saddleback residential subdivision (without identifying it by name), is located just to the southeast of the tap point. The commenter is correct that Figure C.7-2 does not extend the residential development in this area far enough to the north. That figure depicts the generalized land uses for a large area encompassing two counties and numerous cities, and may contain some minor inaccuracies such as the one noted in the comment. More importantly, the discussion on page C.7-11 accurately describes existing conditions adjacent to the L1 alignment, including the Saddleback subdivision.

Implementation of Alternative L1 would not encroach on protected open space, as asserted in the comment. The underground alignment would be located on the north side of Raymond Road, outside of the Alkali Sink/Bird's Beak Preserve. The L1 transition structure would be located north of Raymond Road, on the west side of the Contra Costa-Newark transmission corridor. Figure B-4 depicts a typical transition station representative of the L1 structure. These would be the only visible components associated with Alternative L1. Given the existing transmission corridor with numerous lattice support towers and conductors, the addition of a single tubular support tower and the smaller step-down structures shown on Figure B-4 would not significantly alter existing visual conditions in the area. It should be noted that few homes in the Saddleback subdivision would have views of the transition site, due to orientation, intervening topography and other houses, and the 8-foot masonry wall enclosing the

development. In the limited number of homes with a line-of-sight to the transition site, views would only be available from second-story bedroom windows.

- 102-2 The transition station that would be used to convert the overhead transmission lines at the CC-N lines to underground lines along Raymond Road would be located in a manner that does not affect the existing natural gas pipelines in this area. These lines were not specifically addressed in the EIR, but the EIR does include Mitigation Measure S-1 requiring PG&E Co. to coordinate with underground utility owners prior to final design of the project.
- 102-3 No response needed; the commenter's support for the Draft EIR's finding the No Project Alternative to be Environmentally Superior in the North Livermore area is acknowledged.
- 102-4 The commenter is correct that if the D2 Alternative is selected, part of the P2 line would not be required. Assuming that the North Livermore Substation is still constructed (the Draft EIR found the No Project Alternative to be Environmentally Superior to this component of the Proposed Project), then either the Proposed route, P1, P2, or P3 Alternatives would be required for the transmission line to feed the North Livermore Substation.

### COMMENT SET 103: BARBARA TABAK

- 103-1 The commenter's opposition of the S1 Alternative and preference for Proposed Project in Pleasanton are acknowledged. Please also see General Response GR-4 regarding visual impacts along Isabel Avenue.
- 103-2 The commenter's opposition to routes through Sycamore Grove or Veterans Parks is acknowledged.

#### COMMENT SET 104: NANCY TIETJEN

104-1 The commenter's opposition to the S1 Alternative is acknowledged. Please see Response Comment 11-9 regarding public involvement/notification, and General Response GR-1 regarding EMF.

#### COMMENT SET 105: STEVE AND SUSAN SPRINGER

- 105-1 Draft EIR Section C.9.1.3 addresses "Wind, Earthquake, and Fire Hazards" and explains the transmission line design mechanisms that minimize fire risk.
- 105-2 Section C.12.5.1.4 of the Draft EIR analyzes the visual impacts associated with the proposed North Livermore Substation. Key Viewpoint 16, Figure C.12-18B, presents a visual simulation of the proposed substation as it would appear once constructed along the west side of North Livermore Avenue. The proposed substation was determined to be a significant and unavoidable Class I visual impact. As defined on page C.1-3 of the Draft EIR, a Class I impact cannot be mitigated to a level that is less than significant; however, implementation of Alternative P2 (underground through this area) would eliminate the significant impact associated with the transmission line portion of the project.
- 105-3 As described in Section C.11.5.1.2 on page C.11-29 of the Draft EIR, operation of the proposed North Livermore Substation would cause no appreciable impacts on transportation, as maintenance would be limited to periodic inspections and repairs as necessary. It should be

noted that there would be no daily trips associated with operations at the proposed substation because the station would be an unmanned facility.

105-4 The commenter's support for the Environmentally Superior Alternative (No Project) in North Livermore is acknowledged. If the CPUC adopts this alternative, PG&E Co. would have to reapply in the future to construct a substation in this area and its location would be re-evaluated based on the conditions existing at that time.

#### COMMENT SET 106: WILL AND CARYN EVANGELISTA

- 106-1 Please see General Responses GR-1 and GR-2.
- 106-2 Project-related impacts to vehicle, pedestrian and bicycle circulation are described in the Draft EIR in Section C.11.2, at pages C.11-15 through -35. It is acknowledged in the Draft EIR that Bernal Avenue is a major local arterial in the study area, which carries over 10,000 vehicles per day. The Draft EIR acknowledges that project construction activity on Bernal Avenue would cause intermittent traffic constraints throughout the area and would interfere with the circulation of pedestrians (including school children), bicycles and local transit service. The project could also interfere with access to residential and commercial uses and impact emergency vehicle circulation.

The Draft EIR proposes mitigation measures to address the type of impacts noted in the comment. At pages C.11-19 through-25, specific mitigation measures are prescribed for project-related impacts, including road closures, pedestrian, bicycle and emergency vehicle circulation and the interruption of scheduled transit service. Beyond the specific Draft EIR mitigation measures, PG&E Co. would be required to adhere to all applicable laws, regulations and standards. In terms of transportation issues, a key requirement (in law/regulations as well as in recommended mitigation measures) is the preparation of a transportation management plan for each location where a roadway would be directly affected by construction activities.

#### COMMENT SET 107: MITCH AND KARLA BOYDSTUN

- 107-1 The Draft EIR acknowledges and evaluates the public's concerns about the safety, and potential health effects, of transmission lines in Draft EIR Section C.9. With regard to noise issues due to the overhead lines, see Section C.8.3.1.2 on page C.8-16 of the Draft EIR for a description of potential noise impacts associated with "corona noise". Potential impacts associated with corona noise have been found to be less than significant.
- 107-2 Please see General Response GR-3.
- 107-3 Please see Response to Comment PPH-34 and General Response GR-4.

#### COMMENT SET 108: GENE & PATRICIA BROADMEN AND THEODORE TAYLOR

108-1 The comment indicates that the location of the L-1 substation becomes feasible if the Livermore FCC station is relocated. See page C.10-16 of the draft EIR which discusses Mitigation Measure S-2, the relocation of the FCC station as advocated by the comment.

#### **COMMENT SET 109: LAURA DANIELSON**

109-1 The Final EIR (Section B.3 and C.2) evaluates the use of "New Vineyard Avenue" as a means of reducing impact to the future Neal Elementary School and other residences along "Old" Vineyard.

# COMMENT SET 110: CECILY T. TALBERT (CENTEX)

- 110-1 Please see General Response GR-4.
- 110-2 Please see Response to Comment A-3.
- 110-3 Please see General Response GR-4.
- 110-4 Please see General Response GR-4.
- The L2 Alternative would constitute one transmission line. The visual impacts of that line are 110-5 discussed above under the general response regarding Isabel Avenue. The S2 Alternative would constitute a second transmission line and would be located perpendicular to L2 along the north side of Stanley Boulevard. While it is true that there would need to be a taller structure at Stanley Boulevard to span the existing lines, the structure would not appreciably change the viewer's overall visual impression of the L2 line when viewing either north or south along Isabel Avenue. The addition of the S2 line along the north side of Stanley would be considered visually adverse but not significant given the context of existing transmission and distribution lines and quarry structures as shown in Visual Resources Figure C.12-6. The cumulative visual impact of the intersection of the S2 and L2 routes when viewed from the vicinity of the intersection of Isabel Avenue and Stanley Boulevard would be greater than if viewing either the This combined visual impact would indeed be adverse. S2 or L2 routes individually. However, the visual character of the S2 (in terms of form and line) would appear similar to the existing transmission and distribution lines along Stanley Boulevard and the visual impact of the S2 intersection with the L2 Alternative would be similar to the intersection of the existing lines with the L2 Alternative. The resulting cumulative visual impact of viewing both the S2 and L2 in the same viewshed would be adverse but not significant.
- 110-6 Within the context of land disturbing mining activities that are to be conducted in the immediate vicinity of Isabel Avenue at various points in time over the next several decades, the visual impact of any temporary access road associated with transmission line installation is considered not significant.
- 110-7 Please see General Response GR-4.
- 110-8 Please see General Response GR-4.
- 110-9 The adopted *Specific Plan for Livermore-Amador Valley Quarry Area Reclamation*, which supercedes the *Livermore-Amador Valley Quarry Reclamation Plan*, states explicitly that upon completion of mining the quarry operators are to deed all water areas and necessary supporting land areas of their properties to Zone 7 Water Agency for that agency's operation of a chain of lakes. The Chain of Lakes are to be operated for water conservation, water transmission, groundwater recharge, flood control, and water quality management purposes. While limited recreational uses compatible with these water management uses may be permitted at the

discretion of Zone 7, discussions with representatives of that agency have revealed that little if any recreational use of the Chain of Lakes is likely to be allowed.

The alternatives passing through the quarry area were eliminated because they would be located in the middle of active mining operations, which would be a threat to their structural stability. Alternatives S1 and L2, on the other hand, would be located at the very edge of the quarry areas, and would be less exposed to being struck by trucks or mining equipment. However, substantial zones of protection would be required at each tower location. Mining within those areas would be precluded, and PG&E Co. would be required to compensate the affected quarry operator(s) for the fair-market value of the foregone aggregate materials located in the protection zones. The safety hazards referenced in the comment would be related to the physical and electrical hazard to mine workers if a support tower were accidentally knocked down. The protection zones discussed above would eliminate the possibility of such accidents, and no other hazards would be associated with the S1/L2 Alternatives.

- 110-10 EIR preparers requested that PG&E Co. review this comment regarding feasibility of obtaining railroad property. PG&E Co. does not agree with this comment regarding the infeasibility of condemning railroad property for use for a transmission line. Condemnation of property (as opposed to negotiation for purchase of an easement) is generally more time consuming and therefore is not the preferred method that PG&E Co. would use to obtain use to obtain rights to property. The railroad would be likely to grant PG&E Co. a parallel encroachment permit, but PG&E Co. is not willing to accept this type of permit for a transmission line because it would require that PG&E Co. to relocate the line with 30 days notice at the railroad's discretion. The CPUC does not believe that the Surface Mining and Reclamation Act applies in this situation.
- 110-11 Please see General Response GR-4 regarding Isabel Avenue.
- 110-12 The route of the underground line along Vineyard Avenue varies along the roadway. As stated in Draft EIR Section B.6.1.2, the route would be south or north of the roadway depending on terrain. The homes that may be constructed on Vineyard Avenue in the area of the Vineyard Specific Plan would in some cases be adjacent to the S2 underground route. These impacts are not directly considered in the Draft EIR because the baseline for analysis, according to CEQA, is the date of the Notice of Preparation (April, 2000), at which time these homes did not exist and were not approved by the City of Pleasanton. Regardless, the Final EIR evaluates a route variation that would follow "New Vineyard Avenue" where no homes are currently planned (see Response to Comment 109-1).

According to the City of Pleasanton, "Old Vineyard" will still be a vehicular roadway after construction of "New Vineyard" because it is required for access to properties along that street. It will also become accessible as a trail. However, as explained above, the EIR does not determine impacts on future land uses that are not currently approved.

- 110-13 The Windemere development is located along Dougherty Road in Dublin/San Ramon, and is not near the D1 Alternative. EIR preparers assume that the commenter intended to reference the D2 Alternative. Section C.7.4.3 describes the location of this Alternative and the adjacent development now being constructed. Impacts are described as being similar to those of the Proposed Project, and all mitigation measures recommended for construction or operation would apply also to this route.
- 110-14 Please see General Response GR-4.

# COMMENT SET 111: PAUL E. WHITE (KIEWIT)

- 111-1 The following mitigation measure is added to the Final EIR to ensure that potential conflicts with this and other landowners would be minimized during project design.
  - **L-15a** If the D1 Alternative is selected, PG&E Co. shall address the land use concerns of private landowners (including Kiewit Construction Company) by modifying final design to minimize the land use impacts of the route on owners' continued use of lands crossed by transmission lines (e.g., by adjusting tower height or specific tower location). Such design modifications, if any, shall be submitted to the CPUC for review prior to the start of construction, as well as documentation regarding the potential environmental impacts of the proposed change.

# COMMENT SET 112: JEREEN GILBERT

- 112-1 CPUC General Order (GO) 131D requires that PG&E Co. comply with CEQA and other CPUC rules in evaluation of transmission lines (over 200 kV) and power lines (between 50 and 200 kV). However, distribution lines (under 50 kV) are exempt from the GO 131D requirements and may be constructed by PG&E Co. without specific CPUC approval. Please note that distribution system characteristics are described in the Draft EIR on page B-36.
- 112-2 The Draft EIR identifies an impact to the San Joaquin County to Shadow Cliffs Regional Trail (a segment of the Iron Horse Trail) on pages C.7-49 to C.7-50. It is unclear what unpublished alternative the commenter is referring to, but the identified impact on regional trail users would apply to any overhead alignment down Stanley Boulevard.
- 112-3 Please see General Response GR-1.
- 112-4 Please see Response to Comment 11-9 and Final EIR Section G regarding public involvement/notification.

# COMMENT SET 113: LONA MCCALLISTER

- 113-1 Comment acknowledged.
- 113-2 As explained in Draft EIR Section C.9.1.2, the research program supported by the CPUC and the California Department of Health Services is scheduled to issue its final report in December 2001. Please contact the California EMF Program for further information (<u>http://www.dnai.com/~ emf/</u>; 1515 Clay Street, Suite 1700, Oakland, California 94612, 510-622-4500. See also General Response GR-1.
- 113-3 The commenter is referring to the visual impact analysis of PG&E Co.'s Proposed Project, which would follow North Livermore Avenue from Manning Road, resulting in a significant visual impact. Impacts can be reduced by either mitigation measures that reduce impacts, or by implementation of alternatives that eliminate the impact entirely. Several alternatives are presented in the Draft EIR to reduce or eliminate this impact: the P2 and P3 Alternatives, and the L1 and L2 Alternatives. The Draft EIR found that the No Project Alternative was Environmentally Superior in the North Livermore area, but that the P3 Alternative was preferred if the project was going to be built. This Alternative would eliminate the overhead line along North Livermore Avenue, but the substation would remain as proposed.

- 113-4 See Response to Comment 113-3 regarding the Environmentally Superior Alternative in North Livermore. Table ES-4 explains the reasons that the L2 Alternative is considered to be environmentally inferior to the P3 Alternative. The commenter is correct that this Alternative does not have the significant visual impacts of the Proposed North Livermore Substation, but it does have more severe impacts in many other environmental disciplines.
- 113-5 Please see General Response GR-1.

#### COMMENT SET 114: RICHARD, PRISCILLA, SIDNEY LEE

- 114-1 Please see Response to Comment A-3 and General Response GR-4. The commenter's opposition to Alternative S1 is acknowledged and will be considered by the decision-makers prior to deciding whether or not to approve the Proposed Project or one of the alternatives.
- 114-2 Please see General Response GR-5 regarding the alleged inequity of infrastructure impacts.

#### **COMMENT SET 115: SCOTT EVERS**

115-1 The commenter's opposition to the S1 Alternative is acknowledged. Please note that the S1 Alternative is an alternative to the Proposed Project, and is not the Environmentally Superior Alternative.

#### COMMENT SET 116: CAROL GERICH

116-1 The commenter's opposition to the North Livermore substation is acknowledged. The Draft EIR identified significant visual impacts for the Proposed Substation and transmission lines due to the scenic nature of this area. Two other substation locations (L1 and L2) were considered, but were determined to be environmentally inferior to this location due to range of environmental impacts at those locations (see Draft EIR Table ES-4 for a summary of impacts). The Proposed North Livermore Substation, at 5 acres, is not "massive" as substations go – large substations are at least 20 acres in size and require substantially more equipment.

#### **COMMENT SET 117: ED MIRACLE**

- 117-1 The Environmentally Superior "Build" Alternative (P3) would have the transmission lines run underground, as recommended by this commenter.
- 117-2 The Dagnino Road substation site was considered but rejected in the Draft EIR (as described in Section B.5.4.3.2). Note that Mitigation Measures L-16, L-17, and L-18 would reduce the visual impact of the Proposed North Livermore Substation.
- 117-3 Please see General Responses GR-1 and GR-3.

#### **COMMENT SET 118: DAVE MILLER**

- 118-1 Please see General Response GR-1.
- 118-2 Please see General Response GR-3.
- 118-3 Please see Final EIR Section D, which presents the conclusions regarding comparison of alternatives.

#### **COMMENT SET 119: GERALD HEDSTROM**

119-1 Please see General Response GR-1.

#### COMMENT SET 120: NORAIR AND MARINA KHACHIYAN

120-1 Please see General Response GR-1 regarding EMF and General Response GR-4 regarding issues related to the S1 Alternative along Isabel Avenue.

#### COMMENT SET 121: FOLEY FAMILY

- 121-1 The commenter's opposition to the Proposed Route and the S4 Alternative are acknowledged.
- 121-2 The cost of the Proposed Project or alternatives will be considered in the CPUC's general proceeding and is not within the scope of this EIR.
- 121-3 Visual and land use impacts of the Proposed Project are addressed in Sections C.12 and C.7, respectively, of the Draft EIR.
- 121-4 The value of the Foley property and the economic impacts of the Proposed Project or S4 Alternative are beyond the scope of the CEQA document. These issues are addressed in the CPUC's General Proceeding (for which this testimony was prepared).
- 121-5 The presence of overhead transmission lines would not preclude residential development or park use of the property. Those land uses can be designed around the transmission line to minimize its visual impact on subsequent land uses.
- 121-6 The commenter's support for the S1 or S2 Alternatives is acknowledged.
- 121-7 See Response to Comment 121-4.
- 121-8 EIR preparers agree with the response to the stated question.
- 121-9 As stated in Section C.4.2.4.1, Mitigation Measures for Cultural Resources, five mitigation measures are recommended (C-1, C-2, C-3, C-4 and C-5), which if implemented, would reduce the potential impacts of the Proposed Project (and Alternatives) to a less-than-significant level **(Class II)**. In Section C.4.3, the general impacts and mitigation measures delineated in Section C.4.2.4.1 are applied to the Proposed Project components and Alternatives.
- 121-10 The debris flow source areas found between approximately Mileposts M2.2 and M2.6 (Majmundar, CDMG, 1991) will be avoided by the adjustment of tower locations in that area. The debris flow source areas also pose a significant hazard to the all-weather access road proposed by PG&E Co. to build and maintain the transmission line along the overhead portion of the Proposed route.

The mapped landslides near the underground portion of the Proposed route between Mileposts M2.9 and M3.0 (Id.) are on the eastern side of the ridgeline and will be avoided by placement of the transmission line along the crest of the ridge line.

The debris flow source areas mapped in the area around the transition station (Id.) will not affect the transmission line along the proposed route, either the overhead or the underground

portion of the route, as they are downhill of the route and only affect the shallow soil in those areas.

The S4 overhead Alternative route crosses over two small to moderately large areas mapped as landslides (Id.), however, these areas are not beneath the supporting tower structures and will neither affect nor be affected by the construction of the overhead transmission line. The underground portion of the S4 Alternative route passes close to the head of one small landslide, nearby two debris flow source areas, and near the edge of a second larger queried landslide deposit. All of these hazards are to be identified in the field during the geotechnical investigation phase of design required under Applicant Proposed Mitigation Measure 13.9, and are to be avoided along the route of the underground portion of this Alternative. With proper design and construction they should not affect, nor be affected by the construction and operation of this Alternative route.

- 121-11 There is a large "queried" (possible) landslide mapped on the side of the hill above the juncture of the S2 and S4 Alternative routes (Majmundar, CDMG, 1991). This landslide does not pose a significant hazard to the S2 transmission line in this area because the transmission line would be located underground, to the northeast of Vineyard Avenue. The S4 route would need to be constructed to the side of this potential landslide.
- 121-12 This question and answer address the key terrain differences between the Proposed and the S1 Alternative in the Pleasanton area and the implications due to these different physical settings. This dialogue is accepted. Impacts 6-3 and 6-4 of the Draft EIR discuss the potential for erosion and surface water and groundwater contamination by the Proposed and S1 Alternative routes.
- 121-13 Comment acknowledged. The commenter is summarizing findings of the Draft EIR, and no response is necessary.
- 121-14 The commenter is correct that the S4 Alternative is one of the longest alternatives and that the overhead portion would cause potentially significant visual impacts if Mitigation Measure V-2 is not implemented. This mitigation does not necessarily require additional undergrounding, as implied in the comment, but presents a strategy to lower the heights of towers in order to minimize their visibility.
- 121-15 Alternative S4 route is preferred over all the other Pleasanton Area routes because fewer sensitive receptors would be impacted under this Alternative.
- 121-16 Please see General Response GR-1.
- 121-17 Please see "PM10 Emissions" on page C.2-12 of the Draft EIR for a description of the potential PM10 impacts that would be associated with the project. Potential significant PM10 emissions would be mitigated to a level that is less than significant with implementation of Applicant proposed measures 10.1a through 10.1k (see Table C.2-10 on page C.2-10) and Mitigation Measures A-1 through A-4, described on page C.2-12 and C.2-15 of the Draft EIR.
- 121-18 This comment comports with the Comparison of Alternatives in Draft EIR Table D-1.
- 121-19 Draft EIR Section C.12.3.4 identifies a potentially significant visual impact only for the northernmost overhead portion of the S4 Alternative route due to its potential visibility from Pleasanton and Livermore. No other significant visual impacts were identified for either the

Proposed Route or the S4 Alternative, due to the remoteness and inaccessibility of the overhead route locations. The Draft EIR identifies a significant visual impact for the S1 Alternative in Sycamore Grove Regional Park, which could be mitigated by use of the S2A underground route. No significant visual impacts have been identified for the remainder of the S1 Alternative.

- 121-20 See General Response GR-3 regarding property values and the Response to Comment 121-4.
- 121-21 The commenter's description of the destruction of Roble Valle (in the Pleasanton area) if the Proposed Project is constructed is acknowledged.
- 121-22 As a mitigation measure for the Proposed Project, the Applicant proposes to install earthen berms and vegetation that will screen the transition structure from view from the north (see Visual Resources Table C.12-3, Mitigation Measure 6.9 and Figure C.12-3B). See also Responses to Comments P-16 and P-17.
- 121-23 Please see General Response GR-1 regarding EMF health risks and Response to Comment 121-14 regarding the visual impacts of the S4 Alternative. Many mitigation measures are presented in the Draft EIR to reduce construction impacts on nearby residents; these measures would apply to the Foley residences if this Alternative is constructed.
- 121-24 The switching station referenced in this comment is a part of Phase 2 of the project, which would only occur if certain combinations of alternatives were constructed. Potential construction impacts on grazing activities would depend on the time of year during which construction took place. The construction of the first tower alone should not disrupt grazing since construction would be constrained to a single site that could be fenced and construction traffic would be minimal. The landowner should be able to negotiate conditions of use with PG&E Co. that would allow construction while not disturbing ranching operations.
- 121-25 See Response to Comment 121-24.
- 121-26 Potential loss of grazing land opportunity or costs associated with construction of fences to protect cattle during construction would be accounted for in PG&E Co.'s negotiation of terms of its easement across private land. The landowner should be compensated for any loss of use of his land that results from PG&E Co.'s project.
- 121-27 Comment indicates concern that construction of transmission line would interfere with the operation of a cattle ranch, displacing workers. Construction of the transmission line would be done in segments, and is unlikely to substantially interfere with the operations of a cattle ranch. PG&E Co. would work with the property owner to phase the work and would provide compensation if the owner is deprived of use of the property during the construction period.

#### COMMENT SET 122: ROBIN MARGOLIN

122-1 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged.

# H.4 RESPONSES TO DRAFT EIR COMMENTS FROM THE APPLICANT (PG&E CO.)

### COMMENT SET 123: MORRISON & FOERSTER (ON BEHALF OF PACIFIC GAS & ELECTRIC COMPANY, PG&E Co.)

- 123-1 These individual comments are addressed in subsequent responses.
- 123-2 The commenter disagrees with the Draft EIR's conclusion that the Proposed Project would result in a significant, unavoidable **(Class I)** impact associated with providing electric service infrastructure to the currently relatively undeveloped North Dublin and North Livermore areas (via the new Dublin and North Livermore Substations), which would accommodate growth levels in these areas beyond those <u>currently</u> permitted by local or regional plans and policies. The rationale for this conclusion is clearly laid out at Draft EIR pp. E-3 to E-4. However, the commenter does not address most of the points made in Section E, which supports the significant impact conclusion with detailed discussion.

The commenter incorrectly characterizes the Draft EIR as concluding that a potential mitigation measure limiting the number of distribution connections "would be effective and feasible" (PG&E Co. comment letter at p. 6). To the contrary, the Draft EIR plainly states that such limits "are not recommended (at Draft EIR p. E-4), and found the impact to be unmitigated, and therefore a significant, unavoidable **(Class I)** impact. PG&E Co.'s comment states that it would accomplish such mitigation (limiting distribution connections) by installing "one transformer initially at each substation, although each substation is designed to eventually include four transformers" (PG&E Co. comment letter at p. 6). This approach could provide a means to limit distribution connections if:

- It is made a condition of the CPUC's CPCN to PG&E Co. (i.e., limiting each substation to one transformer until and as PG&E Co. demonstrates to the CPUC that additional transformers are warranted by further approved development in the substation service area, via plans adopted by the relevant land use jurisdiction); and
- The capacity of the initial transformer at each of the new (Dublin and North Livermore) substations can be objectively shown to generally equate to the growth which is <u>currently</u> permitted in the service areas for each substation.

It bears repeating from the Draft EIR that CPUC approval of the Environmentally Superior Alternative D1 (South Dublin Alternative) would avoid this Class I impact for the Proposed Project in the Dublin area, by moving the additional substation capacity south, toward the I-580 corridor where development is largely focused (Draft EIR at p. E-3). This would still leave a Class I impact for the North Livermore area, however (as noted in the Draft EIR) Alternative L2 is not the Environmentally Superior Alternative for the North Livermore area.

- 123-3 The commenter disagrees with the Draft EIR's conclusion that the No Project Alternative would be Environmentally Superior for the North Livermore and Phase 2 components of the Proposed Project. The points of disagreement in this comment are addressed as follows:
  - PG&E Co. cites Draft EIR p. D-13 to D-14 as "concur(ring) with and support(ing) PG&E Co.'s load growth projections demonstrating the need for all components of PG&E Co.'s Proposed Project." No such concurrence nor support is found at Draft EIR pp. D-13 to D-14.
  - PG&E Co. points to an apparent inconsistency in the Draft EIR's stating (at p. A-5) that it "does not intend to provide conclusions about the need for the Proposed Project" and its finding the No Project

Alternative superior for these two components. However, in the same paragraph cited by PG&E Co.'s comment, the Draft EIR clearly states: "Project Need does affect the comparison of alternatives and the identification of the Environmentally Superior Alternative in accordance with the requirements of CEQA (see Part D herein)." (Draft EIR at p. A-6)

- PG&E Co. states that local generation is the only means by which electric service could be provided under the No Project scenario in North Livermore and under Phase 2 conditions. The Draft EIR concludes in favor of the No Project Alternative for only the North Livermore Area and Phase 2. This is consistent with the Draft EIR's assumption that a Local Generation Alternative would not eliminate the need for the Proposed Project as a whole. Local generation is <u>not</u> the only scenario under the No Project Alternative: the Contra Costa-Newark line could be reconductored or the Las Positas Substation could be expanded. These discussions are presented in Draft EIR Section B.7, as well as at p. A-15 in discussing modeling of the Tri-Valley electric system performed jointly by the CAISO and PG&E Co.
- The commenter cites the Draft EIR's reference to a "five-year horizon" as flawed for the Proposed Project in discussing the No Project designation for North Livermore. This "five-year horizon" relates to the modeling performed by the CAISO and PG&E Co. for the 2005 timeframe, in which they evaluated the electric system needs addressed by the Proposed Project. It is not intended to define the "life" of the Proposed Project, but the near-term planning horizon which can reasonably be evaluated in a CEQA document intended for practical use by agency decision-makers.
- The commenter tries to raise another inconsistency in the Draft EIR, citing the Draft EIR's general concurrence with PG&E Co.'s load projections. The No Project conclusions for the North Livermore and Phase 2 components were <u>not</u> based on a disagreement with PG&E Co.'s load projections, but rather on whether these projections <u>require</u> the significant environmental impacts associated with these Proposed Project components or whether the need could be met in other ways, as discussed in Draft EIR Section D.4.

See also Response to Comment 123-2.

123-4 The Draft EIR stated "[t]he hazard of seismic failure of Del Valle Dam, however improbable, *could* affect the Proposed Project facilities and the surrounding area" in Section C.5.3.1.1, on page C.5-31. The Draft EIR also stated that "[t]he extent of damage to project facilities would [vary,] ... with the level of damage increasing to nearby facilities as the extent of damage increased," (ibid.) meaning that as the rate of dam failure increased, the real extent of the flooding damage would also increase, and those facilities closer to the dam would be affected more severely. Facilities along the channel of Arroyo Valle and along fast-flowing portions of the overbank flow would be subject to scouring and the potential undermining of structure foundations or exposure of underground utilities. Facilities more distant from the stream channel and fast-flowing currents would be subject to potential inundation and fouling by the turbid water.

The Draft EIR also stated that "the project facilities most affected would be the [Phase 2] Stanislaus Corridor Alternative's crossing of Arroyo Valle, the S1 and S2 Alternative alignments along East Vineyard and Vineyard Avenue adjacent to Arroyo Valle, the S1 and L2 Alternatives' crossing of Arroyo Valle along Isabel Avenue, the Proposed Project's crossing of Arroyo Valle south of Vineyard Substation, and (the inundation of) Vineyard Substation itself" (Id.). This listing of affected facilities was ordered from south to north, *not* in order of most severely affected facilities. This listing does not include the D1 Alternative Substation site nor the San Ramon Substation site, and upon reviewing the inundation map (Draft EIR Figure C.6-1), these substation sites are outside the maximum flood inundation level. Also, the map shows the northern approximately 475 meters of the S2A Underground Alternative to be

within the maximum flood zone, and since it is underground, it would primarily be subject to inundation. While the Environmentally Superior S2 route runs parallel to Arroyo Valle for most of its length, it is located underground on the southwest side of the channel, which should not experience the extremely severe scouring to be expected on the opposite side of the channel, nor the intensity of scour involved with a channel crossing.

The Draft EIR statement that "[t]he impact of seismic dam failure is a significant, unmitigable **(Class I)** impact on the Proposed Project and its alternatives" (Id.) is not meant to imply that the Proposed Project would increase the potential for failure of Del Valle dam. This statement merely indicates that the potential for seismic dam failure and inundation within the project area is an existing hazard that could affect the project if failure occurred.

The mitigation measure proposed to protect the Proposed Project's crossing of Arroyo Valle is unnecessary. The potential for failure of the dam is extremely small, however, the EIR process is required to address the issue of inundation from seismic dam failure.

The relative level of risk to the Proposed Project facilities and the S1, S2, S2A, L2, and D1 Alternatives is correctly described in the comment, with the greatest potential hazard faced by the alternative segments closer to Arroyo Valle, and increasing hazard with greater proximity to Del Valle dam.

- 123-5 The Draft EIR identified only one significant unavoidable **(Class I)** impact associated with the proposed route in the South Area: the potential for seismic dam failure (see Response to Comment 123-4). It is not accurate to state that this route would have less impacts than other alternatives in all environmental issue areas. As shown in Draft EIR Table D-1, the proposed South Area route would have greater impacts than the S2/S2A Alternative in the residential areas of Pleasanton, with respect to geologic impacts and in visual resources.
- 123-6 The S2A route was created to eliminate overhead transmission lines from the Sycamore Grove Regional Park that would have been located there in the S1/S2 Alternatives. The S2/S2A route would be completely underground, so the transmission towers would not be visible. However, as pointed out in the comment, the overhead/underground transition structure would be located within the park's boundaries (adjacent to the Tesla-Newark transmission corridor). While this structure was not determined in the Draft EIR to create significant visual or land use impacts due to its location adjacent to this major transmission corridor, this portion of the route has been revised so the transition structure would be located on private property (see Final EIR Section B.2).
- 123-7 The comment's statement that the S2A route presented in the Draft EIR would be located within Sycamore Grove Regional Park is correct. As a result, a revised S2A Alternative has been developed and is presented in Final EIR Section B.2.

The comment's statement that "...the Draft EIR is not correct when it states that the proposed transition station would be visible from Kottinger Ranch (Draft EIR at C.12-28)" is itself not correct. The Draft EIR (page C.12-28) correctly stated "As is apparent in the visual simulation, the transition structure would be barely visible, if at all, along the upper ridgeline." This conclusion was based upon a visual simulation (presented in the Draft EIR as Visual Resources Figure C.12-3B), which was prepared by the Applicant in its Proponent's Environmental Assessment to illustrate what the transition station would look like without mitigation. The Draft EIR states further "...the resulting visual impact is anticipated to be

adverse, but not significant **(Class III)**. No additional mitigation measures are recommended beyond the Applicant's proposed measure 6.9...." Measure 6.9 would provide for the recontouring, berms, and landscaping necessary to screen the transition station from view.

- 123-8 Comment acknowledged.
- 123-9 There is one significant impact in the South Area (seismic dam failure, as discussed in Response to Comment 123-4), but this would affect all South Area routes equally. However, the S1 and S2 Alternatives are superior to S4 and the Proposed Project since the S1/S2 routes would avoid any potential impacts to sensitive species and their habitat and that avoidance is preferable to creating an impact (even those that are not considered significant) and subsequently mitigating the impact.
- 123-10 The roadsides along Vineyard Avenue do not provide suitable estivation habitat for the California red-legged frog or California tiger salamander because (1) they have been severely degraded by initial road construction and regular maintenance, (2) most areas along Vineyard Avenue have been converted to vineyards and residential development, and (3) Vineyard Avenue is likely a barrier to dispersal for both amphibian species. According to the USFWS (2000), heavily traveled roads (with more than 30 cars per hour) would be considered a barrier to dispersal. If suitable estivation habitat did exist along Vineyard Avenue, California red-legged frogs or California tiger salamanders would not likely survive road crossings.

The California red-legged frog and California tiger salamander have been observed in the vicinity of the Proposed Route and Eastern Open Space (S4) route. Compaction of soils associated with construction vehicles and tower placement is more likely to impact occupied California tiger salamander estivation habitat along these routes than proposed trenching along Vineyard Avenue. The All Underground East Vineyard (S2A) route has a lower level of potential impacts to these species than the Proposed Route or S4 route, and therefore is "Environmentally Superior".

123-11 The second paragraph of Section C.2.3.3 on page C.2-16 of the Draft EIR draws a comparison between Alternative S2 and the Proposed Project in the Pleasanton area. This paragraph states:

"Although construction impacts under Alternative S2 would be similar in type to those described under the Proposed Project, Alternative S2 involves 2.0 more miles of underground transmission line construction. Thus, construction of Alternative S2 would involve more exhaust and PM<sub>10</sub> emissions than the Proposed Project in the South Area."

With regard to the Draft EIR's impact conclusion about Alternative S1, while excavation activities for tower foundations along this route might generate comparatively more particulate emissions than excavations for tower foundations along other overhead routes, linear underground construction activities would still generate many more times the emissions that would be generated by overhead construction activities within gravel rich soils. Even though Alternative S1 is approximately 25 percent longer than the Proposed Project, the Proposed Project involves nearly 2.5 times the amount (1.6 miles more) of underground construction compared to Alternative S1. Because the Proposed Project involves 2.7 miles of underground construction activities S1, Alternative S1 is preferred over the Proposed Project with respect to air quality impacts.

Regarding the last paragraph of this comment, which does not address air quality impacts, please see Part D, Comparison of Alternatives, in the Final EIR for the CPUC's conclusions regarding the Environmentally Superior Alternative. As explained in Draft EIR Section D, there are many variables and trade-offs which must be considered and weighed in making a thoughtful determination.

123-12 Based on field visits with PG&E Co. staff along the S1/Isabel Avenue corridor, the towers in this area could be located adjacent to existing quarry access roads where no current or future quarrying activity would occur. For that reason, the tower locations should be stable and no unusually deep foundations should be required. PG&E Co. is correct that this alternative would be longer than the proposed route, as illustrated in Final EIR Table D-1. However, with its minimal underground construction, construction time would be reduced. Regardless, this alternative is not considered to be Environmentally Superior.

Regarding the S2/S2A Alternative (considered to be the Environmentally Superior South Area route in the Draft EIR), PG&E Co. presents no evidence supporting its statement that a bored crossing below Highway 84 would be infeasible, and no such objections were raised to the EIR Team during development of alternatives. The route was designed in consultation with PG&E Co.'s Senior Land Planner (Buck Jones) who recommended the illustrated route at the crossing of Highway 84 that would pass behind (west of) the existing structures at this corner.

PG&E Co. is correct that the S2/S2A Alternative would involve more underground construction (5.9 miles, compared with 2.7 miles for the Proposed Project).

If fences and plantings were required to be removed during construction, they would be replaced by PG&E Co. after construction, as their standard construction practice requires that the provide appropriate landscaping after construction is complete.

- 123-13 The number of existing homes along the Proposed Project alignment through the Kottinger Ranch development and along Bernal Avenue is greater than the number of existing residences along the S2 or S4 alignments. The commenter has exaggerated the number of homes that would be passed by these alternative alignments by referencing the total number of homes permitted in the entire Specific Plan area, when a much smaller number of them would actually be adjacent to the alignment. Were a comparable radius extended around the Proposed Project alignment, the number of affected homes would be far greater than the 35 homes cited in the comment. Furthermore, the Specific Plan area will be developed in phases, and the Proposed Project or alternative would be completed well before completion of the majority of planned homes. For these reasons, the EIR preparers stand by the assertion that construction impacts to residential receptors would be greater along the proposed alignment than along the S2/S4 alignment.
- 123-14 Regarding the Brushy Peak impact, please see Responses to Comments B-7 and B-8. Also note that, while the Vasco Road Landfill is located 2,000 to 3,000 feet west of Brushy Peak Regional Preserve, it is not visible from most locations within the park. There is nothing whatsoever of an industrial nature in the area intended as the entryway into the preserve, nor is anything of such nature visible from the entrance area.

The EIR preparers also take exception to the assertion that the Proposed Project would in no way interfere with the Brushy Peak Regional Preserve. Potential impacts to biological resources identified for the Phase 2 alignment, including California red-legged frog and San

Joaquin pocket mouse, would be particularly acute within the preserve because, as set forth in the East Bay Regional Park District's *Master Plan 1997*, "(t)he primary objective of a Regional Preserve is to preserve and protect significant natural or cultural resources." Given the protected status of these animals, they would certainly qualify as significant natural resources. In addition, as noted in Section C.7.6.1.2 of the Draft EIR, the presence of the tall support towers and overhead conductors in the natural setting of the preserve would create a significant visual impact on park users and conflict with EBRPD Master Plan policies regarding electric transmission lines within District parks. While the points made later in the comment regarding screening of the proposed overhead line by existing terrain may have some validity, the transmission line and support towers would nonetheless be visible from numerous locations within the preserve, and would be an inappropriate visual element in the natural context of the park. The commenter does not state a basis for the assertion that the mitigation proposed by PG&E Co. would render visual impacts less than significant, and the EIR preparers stand by the analysis presented in the Draft EIR.

Regarding the characterization of the Chain of Lakes as a recreation area, please see Responses to Comments PPH-34, 21-2, and 110-9. As for the implication that Brushy Peak is a speculative future recreational resource, the EBRPD and Livermore Area Recreation and Park District (LARPD) together currently hold title to 2,035 acres in the preserve, and the preserve is identified in both the EBRPD and LARPD Master Plans. Given these facts, its future seems assured, and certainly transcends the category of "speculative." However, the case for recreational resources in the North Livermore area is not quite as solid. While Alameda County and the City of Livermore have been in agreement regarding future land use in the area, as set forth in their jointly-prepared draft North Livermore Specific Plan, with the passage of Measure D at the time the Draft EIR was being published. Alameda County has been precluded from that planning process, and specific future land uses in North Livermore are more Nonetheless, the adopted North Livermore General Plan undetermined at this time. Amendment remains in effect until a superceding document is developed, and that document identifies a Valley Greenbelt/Buffer across the valley along May School Road that is considerably wider than the greenbelt proposed in the North Livermore Specific Plan. Thus, while the impact identified for the Proposed Project related to a conflict with a recreational trail along North Livermore Avenue may no longer be valid, the other North Area impacts described in Section C.7.5.1.2 remain applicable. Despite the commenter's assertion to the contrary, the Proposed Project would clearly conflict with the Alameda County General Plan policies cited in Impact 7-23, and the EIR preparers stand by the evaluation of this as a significant impact that would be reduced to an acceptable level only by placing the transmission line underground.

The comment describes the Proposed Project as compatible with recreation trails, and states that the facilities would likely be out of the immediate viewshed of trail users. While this may be true for a user standing mid-span between support towers and viewing in a perpendicular orientation to the transmission line, the view of a hiker walking along the alignment would be dominated by the support towers in close proximity and the towers and overhead lines stretching into the distance. While the Draft EIR has concluded that this is an acceptable visual intrusion in an area already substantially degraded from a visual standpoint, such as along Stanley Boulevard in the South Area, it would represent a significant degradation of existing conditions in an area as scenic and undeveloped as North Livermore Avenue. It is acknowledged above that a trail along this roadway may be speculative, though it is still clearly desired by both the City and the County, among others. 123-15 PG&E Co. is incorrect in its statement that the Proposed Dublin Substation would not create significant impacts. While the substation site itself is not visible to the public, in order to reach this substation site via PG&E Co.'s Proposed Route, a new transmission line would have to be constructed across North Livermore and through the open, rolling hills to the substation site. This transmission line would create significant and unavoidable visual impacts (as identified in Draft EIR Section C.12.5 which evaluates the visual impacts of this transmission line segment).

PG&E Co. states that the Dublin Substation must also be able to serve significant new development in the Tassajara and Dougherty Valley areas which are four to ten miles to the north of the D1 Substation site. First, no development is currently planned for the Tassajara Valley due to the withdrawal of earlier development plans. Given the recent passage of Alameda County's Measure D and similar restrictions in Contra Costa County, this development will be substantially delayed, if it does ever occur. While the development in the Dougherty Valley area is currently taking place, this area is within two miles of PG&E Co.'s San Ramon Substation which could easily (and most logically) serve that area. The San Ramon Substation is now heavily loaded, but with the removal of service to the Vineyard Substation from this load it will have the capacity to serve more local load such as that in the Dougherty Valley. Dougherty Valley development is nearly four miles west of PG&E Co.'s Proposed Dublin Substation, and within two miles of PG&E Co.'s existing San Ramon Substation.

PG&E Co. presents a misleading statement regarding CalTrans' policies on underground utilities. The Draft EIR quotation presented refers to underground utilities placed parallel to and within the CalTrans right-of-way. CalTrans regularly issues permits for perpendicular crossings of their rights-of-way, both overhead and underground, as PG&E Co. is certainly aware.

PG&E Co. states that the D1 Substation site is "already under development." There is no construction currently underway in the area of the D1 Substation Alternative. There is an approved plan for the area, which calls for commercial/industrial land uses in the area of the substation. The substation is located in a parcel of land surrounded by (future) Dublin Boulevard on the north, Fallon Road on the east, I-580 on the south, and Tassajara Road on the west. This commercially-zoned area includes over 150 acres, and will by necessity include a number of parking lots. The loss of five acres of this land for a substation to serve the high-electricity demand buildings proposed for this area ("Digital Dublin" in recent San Francisco Chronicle articles) is not a heavy burden for the area to bear.

- 123-16 Please see Responses to Comments F-1, F-3, J-2, and J-3.
- 123-17 Regarding impacts on development planned in the vicinity of the D1 substation, see Response to Comment PPH-147. While the commenter is correct that no significant impacts were identified for the proposed Dublin substation, significant, unavoidable impacts were identified for the transmission line across North Livermore that would feed the substation, and for that reason it was appropriate under CEQA to evaluate alternatives to the proposed substation location. In comparing the D1 and D2 Alternatives, the commenter similarly fails to consider the alternatives in their entirety. While some may consider the Proposed/D2 Substation site to be preferable to the D1 site, others would prefer to see a substation in a context of other development rather than converting open space and creating isolated development. In any event, the Draft EIR considered not just the substation sites but the alternatives in their entirety, including 20 miles of reconductoring for D2, in determining that the D1 Alternative is environmentally preferable to the D2 Alternative and Proposed Project. The commenter also

ignores the planned Dougherty Valley development in asserting that the D2 transmission line would cross an undeveloped area that is not identified by local land use plans as an area that will be developed in the future. Regarding the location of the S1 Alternative route along Stanley Boulevard, the S1 line would not cross the Kiewit equipment yard, but would be located south of the railroad tracks that pass south of the Kiewit property.

- 123-18 The transition station would be adjacent to the I-580 Freeway off ramps and would not be near any gravel operations. It is not clear why the construction of transmission towers 800 to 1,000 feet apart and outside of the haul road would require road closure. PG&E Co. should be able to negotiate an acceptable agreement with gravel operators that would allow construction to occur within a specified area without requiring road closure. Even if road closure were required for short periods of time, haul trucks could exit to the south (via Valley Boulevard) rather than to the north during those times.
- 123-19 The D1 Alternative was created based on PG&E Co.'s PEA Alternative 2, in which the same transmission line route would be used as the Draft EIR's D1 Alternative. Given the complex "decision analysis process" completed by PG&E Co. to select proposed and alternative routes, EIR preparers assumed that PG&E Co. considered these feasibility issues prior to suggesting its Alternative 2.
- 123-20 See Response to Comment M-2.
- 123-21 The additional hydrologic analysis discussed in this comment and specified in Mitigation Measure H-10 is beyond the scope of the hydrologic review during the Draft EIR process. Due to the degraded quality of the existing stream channel at the Proposed Dublin Substation site, the potential impact for additional erosion and stream channel instability at the site is still considered significant **(Class I)** until a more detailed hydrologic investigation suggests otherwise. As stated in the Draft EIR, the outcome of such an analysis (as described in Mitigation Measure H-10) may reveal that with proper design and mitigation efforts, such impacts will be reduced to non-significant levels. The assessment of potential impacts associated with the Dublin Substation in the PEA (8-15) only addresses the likelihood of increased runoff and does not address issues of erosion or further stream destabilization.
- 123-22 PG&E Co. references a sentence from the Draft EIR Executive Summary that is addressing <u>construction impacts</u> only because the P3 route would require 2.4 miles of underground construction (versus 3.0 miles of overhead construction for the relevant Proposed Project segment) it would have greater short-term construction impacts than those of the Proposed Project. As explained in Section D.2, both the P1 and P2 Alternatives are Environmentally Superior to the Proposed Project in the North Livermore area because they would eliminate the significant and unavoidable long-term visual impact associated with the overhead lines. The P3 Alternative would have fewer impacts than the P2 Alternative because it follows a shorter route to the substation.
- 123-23 Note that the P3 Alternative has been modified, moving the eastern portion of the route to the north to avoid a landslide area (see Response to Comment 123-24). Similar to the L1 Alternative (see Draft EIR Section C.3.5.4), it is possible that the May School Road Underground Alternative (P3) could introduce impacts that could affect the area's hydrology. However, this is less likely along the P3 route than for the L1 route, due to the increased distance from the Alkali Sink area. As stated in Final EIR Section C.3, Mitigation Measure B-12 would be implemented for this route (as it would be for L1), and a hydrologic study would

determine whether it is likely that the underground line could affect the hydrology of the area, in turn impact the federally-endangered palmate-bracted bird's beak population that occurs in the Springtown Alkali Sink. Under this measure, pre-construction groundwater flow studies would be required; if results indicated that the flow would be restricted by the underground alignment, then an alternate underground design would be required and reviewed by CDFG and USFWS.

123-24 The comment states that "[t]he one- (L1) to two-mile (P3) segments proposed as underground construction to connect the Contra Costa-Newark line to the new [Proposed North Livermore] substation would in both cases traverse steep hills that may be underlain by unstable soils, and would cross a possibly active fault zone." These three issues, the difficulty of constructing an underground utility over steep terrain, the potential for unstable soils, and the fault crossing are addressed separately below.

The topography underlying the L1 route is nearly level and varies by no more than 10 to 15 feet along its entire length, thus the difficulty of construction over steep terrain and the potential for unstable soils do not apply to this alternative segment. The P3 route traverses one steep hill (hill 762) for about one-fourth of its two-mile length. In addition, east of Dagnino Road, the P3 route crosses approximately 0.4 mile of nearly level topography and 0.4 mile of hilly topography, of which 0.12 mile is mapped as an existing landslide (Id.). This existing landslide is also mapped as extending beneath the existing Contra Costa-Newark transmission line, and the proposed connection to the new transmission line would have to be built within this landslide if the proposed P3 route alignment were approved. These issues can be avoided with implementation of the proposed mitigation of relocating the route away from this steep terrain as described below.

As mitigation for the hazards and increased expense involved in construction along this route, a modification of the eastern portion of the P3 alignment is described in Final EIR Section B.5. This alternate route is along an established roadway for most of its length, traverses nearly level terrain, and avoids the existing landslide on the east side of hill 762 along the originally proposed P3 alignment. This relocated route will limit the potential for slope instability and increased construction costs involved with underground trenching over varied terrain and through an existing landslide, and eliminate the increased hazard involved in constructing the transition structure within an existing landslide. This route crosses the toe of an ancient landslide along the access road, approximately 0.1 mile east of Dagnino Road, for a distance of approximately 200 to 250 feet, however, this landslide feature is mapped as being Plio-Pleistocene in age, and is on relatively gentle slopes, therefore the potential for reactivation of the slide is low.

The unidentified "possibly active fault" is here assumed to be the "Tesla fault" [shown in the lower right corner of Figure C.6-3.C of the Draft EIR], which is not shown on Figure C.5-1 (Tri-Valley Area Faults) because it is not well located, and shown as "inferred" on several older fault maps and used to define the border of groundwater sub-basins of Zone 7. This fault is not believed to be active and does not appear on the Fault Activity Map of California (Jennings, CDMG, 1994) nor the larger scale Geologic Map of the San Francisco-San Jose Quadrangle (Wagner and others, CDMG, 1991). This fault is depicted as a queried fault on the map of Landslide Hazards in the Livermore Valley and Vicinity (Majmundar, CDMG, 1991) extending along the western side of the Las Positas lowland, approximately one-half mile west of the substation site. The fault is inferred to be offsetting Pliocene to Miocene Green Valley and Tassajara Formation units as well as Plio-Pleistocene Livermore Gravels in the hills to the

south (Id.). The offset of Pleistocene units makes the fault "potentially active" and it should appear on the fault map (Draft EIR Figure C.5-1); however, the fault is not crossed by either route, the fault is deeply buried, and is not considered to be a significant seismic source.

- 123-25 See Response to Comment 123-23.
- 123-26 The title on page 30 of the comment letter makes reference to Dublin and North Livermore substations, however the entire analytical portion of the write up talks about Dublin substation and does not discuss the North Livermore site in an analytical fashion. In the very last sentence it is stated that the alternative North Livermore substation feeder routes are inferior, without any effort to justify the statement. The commenter tries to make a case for the Dublin substation and then attempts to automatically extend it to North Livermore by reference. Given the apparent lack of new load in what was thought to be the North Livermore distribution area it seems reasonable for this portion of the project to be put on hold until growth patterns in the area can be determined.

Based on the comment, PG&E Co.'s Proposed Dublin Substation site would have two feeders going in a generally northerly direction and six going to the south. If the site were moved to the south (D1 location) it may be possible for the new Dublin station to serve additional load, now projected to be served from the San Ramon substation, allowing the San Ramon substation to be off loaded allowing it to pick up more of the new load to the north of PG&E Co.'s Proposed Dublin Substation site.

Looking at the general location of the existing and new growth in the Dublin/San Ramon/Vineyard substation areas, the D1 Substation site seems to be more centrally located when compared to the Proposed Dublin Substation site. The Proposed Dublin Substation site only makes sense to the extent there is substantial growth to the north.

If PG&E Co.'s Proposed Dublin Substation site is approved by the CPUC, the option of serving it from the west should be considered (i.e., D2 Alternative) since that alternative is Environmentally Superior to the Proposed Dublin Alternative <u>if</u> reconductoring is not required. The power flow studies completed by the ISO and PG&E Co. concluded that 230kV reconductoring was not necessary for this option. Feeding the station from the west rather than from the east reduces the new transmission construction by about 50 percent. It also keeps the Dublin station load off of the Contra Costa - Newark line, thereby possibly eliminating the need for Phase 2.

- 123-27 The location of the original Switching Station No. 2 has been relocated outside of Sycamore Grove Regional Park. Please refer to Final EIR Figure B-2 for the new location of the Switching Station Site 2. The location of this new site would eliminate potentially significant impacts.
- 123-28 The following mitigation measure has been incorporated to reduce potentially significant flood impacts at Switching Station Site 2 to less than significant **(Class II)**:
  - H-13 Prior to construction, the applicant shall check grading plans and surveys of the proposed site to verify that the ground surface of the proposed substation shall be at least at elevation 10 feet above NGVD (Flood Zone B, 1 ft above the FEMA 100-year floodplain). This research shall be provided to the CPUC in the form of a letter report prior to the start of construction of the Switching Station. If any portion of the site is below elevation 10 feet, it shall be raised.

Also, see Response to Comment 123-27.

- 123-29 Although the comment correctly identifies the potentially significant visual impact that would result from the switching station's location within Sycamore Grove Regional Park (a fact not known during the preparation of the Draft EIR), the comment incorrectly identifies the acreage required for the switching station as approximately two acres. The acreage covered by the components of the switching station would be one acre. Landscaping to screen the station from view or to improve its appearance would extend beyond the one acre covered by the switching station equipment. Also, the switching station would not result in the addition of 39 individual transmission wires as stated in the comment. Switching Station Site 2 has been relocated to avoid Sycamore Grove Regional Park and an accurate description of the station and the associated visual impacts is provided in Final EIR Section B.2.
- 123-30 Potential biological resources impacts associated with the switching station alternatives are described in Section C.13.1 (Switching Station Alternative to Phase 2) on page C.13-2 for Switching Station Site 1 and on page C.13-14 for Switching Station Site 3. The Final EIR considers the potential impacts of the modified S2A Alternative and Switching Station Site 2 in Section C.1
- 123-31 EIR preparers understood that the transition structure would occupy one-half acre of land and would look like the facility illustrated in Draft EIR Figure B-4. It is acknowledge that the correct term is "transition structure;" however, the inconsistent terminology did not affect the analysis presented in the Draft EIR.
- 123-32 The description of the S4 Alternative states that it would use the Proposed Project route from the Contra Costa-Newark (CC-N) line to the point where S4 diverges from the proposed route. The mileage figures for the S4 Alternative in Table ES-1 include the total mileage from the CC-N line. There has been no confusion about the route that this alternative would follow.
- 123-33 Tables C.3-7, C.3-8 and C.3-9 are located on pages C.3-34 and C.3-35 of the Draft EIR, as listed on page xiv of the Table of Contents.
- 123-34 Figure ES-1 is a regional map, illustrating all routes on a single figure so readers can understand the context of each route within the Tri-Valley area. Detailed maps are presented with the description of each area's alternatives (Draft EIR Figures B-13, B-14, B-15, B-16).
- 123-35 The Executive Summary does not present detailed descriptions of each route. Those descriptions are presented in the appropriate part of Section B, Description of Proposed Project and Alternatives. PG&E Co.'s comments are consistent with the understanding of the EIR preparers regarding the transition of overhead to underground lines via the use of transition stations.
- 123-36 Page ES-14, the Draft EIR is hereby corrected from "...sensitive habitats and special status species that may have been affected construction of the Proposed Project." To "...sensitive habitats and special status species that may have been affected <u>by</u> construction of the Proposed Project."
- 123-37 See Response to Comment 123-31. While the Draft EIR maps do not show a symbol for a transition station, the location of the transition is apparent on these maps from the change in line pattern illustrating whether each portion of each route is overhead or underground.

PG&E Co. states that Draft EIR Figure B-4 should show "screening and protective features such as fences, walls and landscaping." Figure B-4 is an exact (scanned) copy of the transition structure figure from PG&E Co.'s Proponent's Environmental Assessment, so it was presumed by the EIR team to be an accurate depiction of this structure and its features.

- 123-38 Page B-7, the Draft EIR is hereby corrected from "...a new single-circuit lattice tower and two short dead-end1 towers would be installed..." to "...a new single-circuit lattice tower and two short dead-end towers would be installed..."
- 123-39 See Response to Comment 123-31.
- 123-40 Figure B-37 was taken directly from PG&E Co.'s PEA, Figure 2-15. The greater depth does not affect the EIR impact assessment.
- 123-41 Page B-10, the Draft EIR is hereby corrected from "15126 (d) Alternatives to the Proposed Action." to "15126.6 (a) Alternatives to the Proposed Action."
- 123-42 See Response to Comments 123-31 and 123-37.
- 123-43 Page B-55, the Draft is hereby corrected from "This route would follows part of the north-south route..." to "This route would follow part of the north-south route..."
- 123-44 The text references MP I5.1, which is from PG&E Co.'s PEA. Mileposts were not provided for the Alternative D1 because it is short in length; therefore, mileposts were not identified for this route. Page B-55 of the Draft EIR is changed from "At this point, it would cross to the east side of the road, continuing north for 0.8 miles to MP I5.2 where it would cross back..." to "At this point, it would cross to the east side of the road, continuing north for 0.8 miles to MP I5.2 where it would cross back..." to "At this point, it would cross back to the east side of the road, continuing north for 0.8 miles to MP I5.2 where it would cross back..."
- 123-45 Table C.3-6, with appropriate table number and title, is located on page C.3-33 of the Draft EIR. Table C.3-9 is located on page C.3-36 and is continued from the previous page.
- 123-46 Tables C.3-7, C.3-8 and C.3-9 are not identified on page C.3-36. These tables are located on pages C.3-34 and C.3-35 of the Draft EIR, as listed on page xiv of the Table of Contents.
- 123-47 The following milepost labeling errors are hereby corrected in Table C.3-12a, C.3-16 and C.3-17 of the Draft EIR. Please note that these changes do not affect the Draft EIR biological resources analysis.

# Table C.3-12a Plant Communities and Other Areas along the D2 Alternative Alignment: Underground Section from the Proposed Dublin Substation to the San Ramon Substation

|                        | Plant Communities/           |                   |
|------------------------|------------------------------|-------------------|
| Milepost (approximate) | Other Areas                  | Comments          |
| B17.30 – B18.09        | Non-Native Annual Grassland  | Grazed            |
| B18.09 – B18.10        | Developed Area               | Tassajara Road    |
| B18.10 – B18.27        | Non-Native Annual Grassland  | Grazed            |
| B18.27 – <u>B18.28</u> | Central Coast Riparian Scrub | Tassajara Creek   |
| B18.28 – B19.86        | Non-Native Annual Grassland  | Grazed            |
| B19.86 – B19.87        | Seasonal Wetland             | Seasonal drainage |
| B19.87 – B19.89        | Non-Native Annual Grassland  | Grazed            |

| Milepost (approximate) | Plant Communities/<br>Other Areas | Comments   |
|------------------------|-----------------------------------|--|
|                        | Blue Oak Woodland/                | Seasonal drainage with blue oaks; Connects several |
| B19.89 – B19.90        | Seasonal Wetland                  | stockponds   |
| B19.90 – <u>B21.0</u>  | Non-Native Annual Grassland       | Grazed   |
| B21.0 – B21.01         | Alkali-Freshwater Marsh           | Alamo Creek  |
| <u>B21.01</u> – B21.40 | Non-Native Annual Grassland       | Grazed   |
| B21.40 – Substation    | Developed Area                    | San Ramon Substation                               |

# Table C.3-16 Plant Communities and Other Areas along the Proposed Transmission Line North Area Route (Phase 2)

|   | Plant Communities/             |   |
|---|--------------------------------|---|
|   | Uther Areas                    | Comments  |
| B0.00 - B0.01                           | AIKAII-FTESTIWALEI MAISTI      | Perenniai urainage with cattali   |
| <u>B0.01 - B0.05</u><br>R0.05 R0.04     | Null-Nalive Allitual Glassianu | Diskeu<br>Dattorson Dass Dood   |
| $\underline{D}0.03 - \underline{D}0.00$ | Non Nativo Annual Crassland    | Crazed wind form  |
| B0.00 - B0.21                           | Non-Native Annual Grassland    | Grazed, wind farm   |
| B1.62 = B1.63                           | Alkali-Freshwater Marsh        | Stock pond  |
| B1.63 = B1.74                           | Non-Native Annual Grassland    | Grazed  |
| B1 74 – B1 75                           | Developed Area                 | Railroad right-of-way   |
| B1.75 – B3.45                           | Non-Native Annual Grassland    | Grazed, wind farm   |
| B3 45 - B3 49                           | Alkali Meadow                  | Seasonally flooded by Mountain House  |
| B3.49 – B3.50                           | Alkali-Freshwater Marsh        | Mountain House Creek  |
| B3.50 – B3.61                           | Non-Native Annual Grassland    | Grazed  |
| <u>B</u> 3.61 – <u>B</u> 3.65           | Developed Area                 | Interstate 580, eastbound   |
| <u>B</u> 3.65 – <u>B</u> 3.70           | Non-Native Annual Grassland    | Interstate 580, median  |
| <u>B</u> 3.70 – <u>B</u> 3.74           | Developed Area                 | Interstate 580, westbound   |
| <u>B</u> 3.74 – <u>B</u> 4.11           | Non-Native Annual Grassland    | Grazed, wind farm   |
| <u>B</u> 4.11 – <u>B</u> 4.15           | Alkali-Freshwater Marsh        | Stock Pond  |
| <u>B</u> 4.15 – <u>B</u> 4.46           | Non-Native Annual Grassland    | Grazed, wind farm   |
| <u>B</u> 4.46 – <u>B</u> 4.49           | Seasonal Wetland               | Grazed  |
| <u>B</u> 4.49 – <u>B</u> 5.58           | Non-Native Annual Grassland    | Grazed, wind farm   |
| <u>B</u> 5.58 – <u>B</u> 5.60           | Developed Area                 | Altamont Pass Road  |
| <u>B</u> 5.60 – <u>B</u> 5.63           | Non-Native Annual Grassland    | Grazed, alkaline soils  |
| <u>B</u> 5.63 – <u>B</u> 5.64           | Alkali-Freshwater Marsh        | Altamont Creek, seasonal – contains cattails, willows                                   |
| <u>B</u> 5.64 – <u>B</u> 5.67           | Developed Area                 | Railroad right-of-way   |
| B5.67 – B8.73                           | Non-Native Annual Grassland    | Grazed, wind farm, <u>San Joaquin saltbush</u><br>habitat                               |
| W2.47-W2.58                             | Non-Native Annual Grassland    | Grazed, San Joaquin saltbush habitat  |
| <u>B8.73 - B8.80</u>                    | Alkali Meadow                  | Grazed, San Joaquin saltbush habitat  |
| <u> B8.80 - B8.90</u>                   | Alkali-Freshwater Marsh        | Unnamed watercourse – contains cattails,<br>willows, blue wild rye, salt grass, bulrush |
| <u>B8.90 - B8.99</u>                    | Developed Area                 | Laughlin Road   |
| <br><u>B8.99 - B9.05</u>                | Alkali-Freshwater Marsh        | Unnamed watercourse – contains bulrush, salt bush                                       |
| <u>B9.05 - B9.13</u>                    | Alkali Meadow                  | Grazed  |
| <u>B9.13 - B9.26</u>                    | Non-Native Annual Grassland    | Grazed  |
| <u> B9.26 – B9.32</u>                   | Developed Area                 | Republic Services Landfill - includes a settling basin                                  |
| <u>B9.32 – B9.45</u>                    | Non-Native Annual Grassland    | Grazed  |
| <u>B9.45 – B9.53</u>                    | Developed Area                 | Republic Services Landfill – paved entrance   |
| <u>B9.53 – B10.13</u>                   | Non-Native Annual Grassland    | Includes a paved drainage   |
| B10.13 – B10.33                         | Non-Native Annual Grassland    | Grazed  |

|                 | Plant Communities/          |  |
|-----------------|-----------------------------|--|
| Milepost        | Other Areas                 | Comments                                   |
|                 | Seasonal Wetland            | Seasonal drainage with scattered live oak, |
| B10.33 – B10.34 |                             | willow                                     |
| B10.34 – B10.35 | Developed Area              | Vasco Road                                 |
| B10.35 – B10.42 | Non-Native Annual Grassland | Grazed                                     |

# Table C.3-16 Plant Communities and Other Areas along the Proposed Transmission Line North Area Route (Phase 2)

### Table C.3-17 Plant Communities and Other Areas along the Brushy Peak Alternative

|                        | Plant Communities/                  |   |
|------------------------|-------------------------------------|---|
| Milepost (approximate) | Other Areas                         | Comments  |
| <u>B9.05 =</u> BP0.00  | Proposed Phase 2 (North Area) route |   |
| BP0.00 – BP0.52        | Non-Native Annual Grassland         | Grazed  |
| BP0.52 – BP0.53        | Developed Area                      | Laughlin Road                                   |
| BP0.53 – BP0.54        | Seasonal Wetland                    | Seasonal drainage, alkali                       |
|                        | Potential Alkali Meadow/            | Heavily grazed by horses, dominated by saltbush |
| BP0.54 – BP0.61        | Non-Native Annual Grassland         |   |
| BP0.61 – BP0.73        | Non-Native Annual Grassland         | Grazed  |
| BP0.73 – BP0.74        | Seasonal Wetland                    | Seasonal drainage                               |
| BP0.74 – BP1.31        | Non-Native Annual Grassland         | Grazed  |
| BP1.31 <u>= B7.83</u>  | Proposed Phase 2 (North Area) route |   |

For Table C.3-17, please note that the west endpoint of the Brushy Peak Alternative is equivalent to Milepost BP0.00 (or B9.05 of the Proposed Phase 2 route) and the east endpoint is equivalent to BP1.31 (or B7.83 of the Proposed Phase 2 route), respectively. Therefore, the approximate locations of all mileposts between the two endpoints can be identified in Figure C.3-1b of the Draft EIR.

Table C.3-12b identifies the plant communities along the D2 Reconductoring route from the San Ramon Substation to the Pittsburg Substation. The mileposts between the two substations are designated with SP. Please note that the San Ramon Substation and Pittsburg Substation are equivalent to Milepost SP0.00 and SP22.75, respectively. Therefore, the approximate locations of all mileposts between the two substations, identified in Table C.3-12b, can be identified in Figure C.3-1b of the Draft EIR.

- 123-48 Page C.3-51, the Draft EIR text is hereby corrected from "The CEQA reviews the proposed actions and..." to "The <u>CDFG</u> reviews the proposed actions and..."
- 123-49 The following milepost labeling errors are hereby corrected on page C.3-91 (Impact 3-1) and C.3-101 (Impact 3.8) of the Draft EIR. Please note that these changes do not affect the Draft EIR biological resources analysis.

**Impact 3-1:** Temporary or permanent impacts to Seasonal Wetlands at Mileposts <u>B19.86</u> F0.86 and B19.89, an Alkali-Freshwater Marsh at Milepost <u>B21.0</u> X0.15, and a Central Coast Riparian Scrub plant community along Tassajara Creek at Milepost B18.27 may occur along the D2 Alternative between the San Ramon Substation and the proposed Dublin Substation during construction.

**Impact 3-8:** Temporary and permanent loss of special status plant species and their habitats may occur during construction. One special status plant species, San Joaquin saltbush, has
been observed along the proposed transmission line route between Mileposts <u>B8.68</u> W2.53 and <u>B8.75</u> W2.60 during surveys conducted by PG&E Co. (1999).

Please see the discussion in Response to Comment 123-47 for explanation of D2 Reconductoring mileposts referenced in Impact 3-2 on page C.3-91 and Impacts 3-8 and 3-9 on page C.3-92 of the Draft EIR.

The milepost references in Section C.3.5.5 of the Draft EIR correspond with Table C.3-15 on page C.3-44. Milepost 0.00 is at the intersection of Isabel Avenue and Vineyard Avenue. Milepost 3.76 is at the intersection of Stanley Boulevard and Isabel Avenue. The endpoint for the L2 Alternative is the substation site study area, at Mileposts 7.06 -7.44. The approximate locations of all mileposts between Milepost 0.0 and the L2 Substation Site study area can be identified in Figure C.3-1b of the Draft EIR.

- 123-50 One page C.5-9, the context of the sentence identified by the commenter indicates that M5.7 and M5.2 are not references to Mileposts. Please note the "M" is defined as moment-magnitude.
- 123-51 The commenter's correction regarding consistency of milepost notations in the Draft EIR is acknowledged.

The first paragraph on page C.5-20 of the Draft EIR is hereby corrected from "...from approximately Mileposts B12.0 to B.13.2 and U0.0 to U1.0." to "...from approximately Mileposts B12.0 to B.13.2 and V0.0 to V1.0."

- 123-52 Page C.6-40, the Draft EIR is hereby corrected from "The outcome of Mitigation Measure H-13..." to "The outcome of Mitigation Measure H-10..."
- 123-53 The commenter's correction regarding consistency of milepost notations in the Draft EIR is acknowledged.
- 123-54 See Response to Comments 123-31 and 123-37.
- 123-55 Alternative S1 would not be located in Vineyard Avenue west of Isabel Avenue, and would not be located in the Specific Plan area. Alternative S2 would, however, and an impact related to a conflict with the Specific Plan is identified in Section C.7.3.3, with mitigation recommended to reduce the impact to a less-than-significant level. Please also see Responses to Comments PH-114, 54-6, and 54-8.
- 123-56 The purpose of the discussion on page C.7-7 is to describe existing land uses along the S2 alignment, not identify applicable planning documents. That task is reserved for Section C.7.1.2.3, and is carried out in the case of the Alternative S2 on page C.7-31, where the *Vineyard Avenue Corridor Specific Plan* is discussed. (Alternatives S2 and S2A are identical within the City of Pleasanton.) Please also see Response to Comment 123-55.

123-58 The EIR preparers were aware of the presence and location of all transition stations and included these facilities in their issue area analyses.

The Draft EIR is hereby corrected, the following sentence has been added to Page C.7-8: "Just before the Fallon Road interchange with Interstate 580, the alignment would convert to an

<sup>123-57</sup> and

underground cable and head west along the south side of the freeway for about 2,600 feet, crossing currently vacant land flanked by single-family residential development on the west. <u>A</u> transition station is required to convert the overhead transmission line to an underground cable. Just east of this subdivision..."

on page C.7-10, EIR preparers were unable to find the referenced comment.

- 123-59 See Responses to Comments 123-31 and 123-37.
- 123-60 The EIR preparers were aware of the presence and location of all transition stations and included these facilities in their issue area analyses.

The following sentence has been added to Page C.7-10: "Immediately after this change in jurisdiction, at approximately Milepost B21.1, the alignment would transition from underground to an overhead alignment as it continues toward the east. <u>A transition station is required to convert the overhead transmission line to an underground cable.</u>"

- 123-61 The meaning of the referenced statement is that the alignment would pass a number of residences, and in some cases they lie to the south of the alignment, while in others they lie to the north of the alignment.
- 123-62 As revealed in the Table of Contents of the Draft EIR (as well as the text of each analytical/topical chapter), each chapter of the document analyzing an environmental resource area has been organized to first evaluate Phase 1 of the project, broken down into three geographic areas (Pleasanton, Dublin, and North Livermore), followed by an evaluation of Phase 2. In Section C.7 (Land Use and Recreation), the Setting discussion has been similarly organized. Thus, the discussion referenced in the comment occurs in Section C.7.1.1.3, all of which pertains to Phase 1 (and Phase 1 Alternatives), while the following subsection, Section C.7.1.1.4 is devoted to a discussion of Phase 2 (and Phase 2 Alternatives).
- 123-63 The following milepost labeling errors are hereby corrected in Section C.7.1.1.4. Please note that these changes do not affect the Draft EIR analysis.

"**North Area (PG&E Co.'s Phase 2).** The Phase 2 alignment would originate at the Tesla substation, which is surrounded by grazing land in unincorporated Alameda County. The alignment would be located in an existing 75-foot-wide vacant PG&E Co. easement, nearly all of which is on land used to graze cattle, except as otherwise noted. Cattle grazing also occurs on the wind farms discussed below. The Phase 2 line would depart from the northwest corner of the substation heading in a north-of-west (i.e., WNW) direction, continuing to cross grazing land. Traversing hilly open space land, the existing easement crosses numerous hills and ridges lined with windmills, in some cases passing adjacent to a line of windmills and in others crossing through a line of windmills. At about Milepost <u>B1.8 C1.0</u>, the easement passes roughly 500 feet to the north of the United States Windpower substation and control room. At Milepost <u>B2.3 C1.5</u>, the easement crosses the Union Pacific Railroad corridor and about 800 feet south of the Southern Pacific Railroad corridor. West of this crossing, the easement continues through wind farms, all of which are crossed by a network of maintenance roads that would provide construction access for PG&E Co.

The alignment would cross Interstate 580 overhead at Milepost <u>B4.4</u> C3.6, with a support tower placed on the southern end of a truck parking apron located adjacent to the eastbound freeway lanes. West of the freeway, at about Milepost B4.9 C4.1, the alignment would pass

immediately north of two stock ponds. At Milepost <u>B6.4</u> C5.6 the easement crosses another railroad corridor and Altamont Pass Road, which provides access to the Altamont Landfill, located about a mile to the northeast. At roughly Milepost <u>B6.9</u> C6.1, the Phase 2 line would cross over a north/south-trending transmission line operated by the Western Area Power Administration (WAPA). A final line of windmills is crossed at about Milepost <u>B7.2</u> C6.4.

The Phase 2 alignment veers slightly to the northwest at Milepost <u>B7.9</u> C7.1, then turns dues west at Milepost <u>B8.7</u> C7.9 and crosses Laughlin Road at <u>Milepost B8.0</u>, about 1,000 feet south of a former residence now owned by the East Bay Regional Park District (EBRPD) and about 800 feet north of a second residence on the east side of the roadway. The EBRPD intends for Laughlin Road to provide access to the Brushy Peak Regional Preserve, which is currently closed to the public. Due to concerns about the visual impacts of PG&E Co.'s proposed crossing of this gateway to an important regional natural resource, an alternative to this crossing location is examined below (the Brushy Peak Alternative Segment).

Continuing in a westerly direction, the easement begins passing immediately to the south, Browning-Ferris Industries' Vasco Road Landfill at about Milepost <u>B9.1</u> C8.3, then turns sharply to the northwest at Milepost <u>B9.35</u> C8.55, crossing closed landfill cells and to the west of the active fill areas of the landfill. At Milepost <u>B10</u> C9.2, the alignment again heads due west. Again crossing grazing land, the easement passes to the south of an existing residence at Milepost B10.3 just before crossing Vasco Road. About 500 feet west of Vasco Road, the Phase 2 line would connect with the Phase 1 line at Milepost B10.4 (at the junction with the Contra Costa-Newark transmission line)."

123-64 The Draft EIR is hereby corrected; the text on page C.7-14 is changed from "...where either of these alternatives would connect in the Stanislaus line." to "...where either of these alternatives would connect into the Stanislaus line."

The Draft EIR is hereby corrected; the Federal Aviation Administration heading on page C.7-16 is now in bold face type.

- 123-65 See Response to Comment s 123-31 and 123-37.
- 123-66 On page C.7-25, the mileposts are consistent with the milepost designations for the Proposed Project in Figure B-2 of the Draft EIR.

The Draft EIR is hereby corrected; the following changes have been made to the Proposed Phase 2 Alignment discussion on page C.7-27:

"**Proposed Phase 2 Alignment:** The Tesla substation and all of the Phase 2 alignment from Milepost <u>B0.8</u> C0 to Milepost B10.4 are entirely within the Large Parcel Agriculture land use category, as designated on Alameda County's *East County Area Plan* land use map. In addition, the area between Mileposts <u>B0.8</u> C0 and approximately <u>B7.2</u> C6.4 is identified on the Open Space Diagram of the *East County Area Plan* as a Wind Resource Area. While the County does not define this as a land use category with development standards and restrictions, it has promulgated policies pertaining to wind farms in the East County area, which are addressed in Appendix 1."

123-67 The Draft EIR text on page C.7-32 now states "<u>This alternative is</u> identical to the Proposed Project alignment from the tap point to the transition <u>station</u> at Milepost M3.1"

- 123-68 See Response to Comment s 123-31 and 123-37.
- 123-69 Section C.8.1.1.2 of the Draft EIR describes the noise environment for areas adjacent to the Proposed and Alternative route alignments and substations. As described in the second paragraph of page C.8-4, the noise environment is described in terms of <u>existing</u> ambient noise levels and sensitive noise receptors. The "Sensitive Receptors" discussion for Alternative S2 did not mention the planned elementary school on Vineyard Avenue because it was not an existing sensitive receptor at the time that the Draft EIR was published. However, potential noise impacts related to the planned elementary school were addressed in the second paragraph of page C.8-18. The paragraph states:

"An elementary school is planned to be constructed south of Vineyard Avenue, and expected to begin holding classes in 2001. Therefore, it is possible that construction of this alternative transmission line route could occur after the school opens. The noise impacts on children in class could be disruptive, causing potentially significant impacts. Mitigation Measure L-12 (time construction around school schedule) identified in Section C.7.3.3 (Land Use) would reduce this impact to less than significant."

- 123-70 The Draft EIR text on page C.8-9 is hereby corrected from "Northeast of I-580, the route passes adjacent to Las Positas College and one to the L2 Alternative substation site study zone." to "Northeast of I-580, the route passes adjacent to Las Positas College and one to the L2 Alternative substation site study zone.
- 123-71 On page C.8-10, the mileposts are consistent with the milepost designations for the Proposed Project in Figure B-2 of the Draft EIR.
- 123-72 The Draft EIR is hereby corrected; the text on page C.8-17 is changed from "It should be noted that the transformers would rarely operate at full capacity, on only the hottest summer days or coldest winter nights." to "It should be noted that the transformers would rarely operate at full capacity, <u>operating at full capacity</u> on only the hottest summer days or coldest winter nights."
- 123-73 Alternative routes S4, P1, and P2 are identified on Figure C.11-1, but were inadvertently omitted from the legend. Because P3 (Mitigation Measure A-6) and S2A (Mitigation Measures V-1, L-7, L-10) are mitigation measures, they were not included in Figure C.11-1. See Section C.13.3.1 for the discussion on traffic and transportation impacts to P3 and Figure C.2-3 for a map of P3. See Section C.13.3.2 for the discussion on traffic and transportation impacts to S2A and Figures B-18 or C.13-a for a map of S2A.
- 123-74 In addition to the information the setting for Isabel Avenue provided on page C.11-7 of the Draft EIR, it is acknowledged that Isabel Avenue is planned as a four-lane parkway, with the potential to construct two additional lanes at some future date. Currently, funds are available for the four-lane expansion and study of that project should begin this summer with construction potentially beginning in 2003. In addition to the widening, a new Isabel Parkway/I-580 interchange is currently under study as a joint project between Caltrans and the City of Livermore. See Response to Comment M-4.
- 123-75 The cited Draft EIR section was specifically for designated bicycle facilities, which the envisioned recreational use of "Old Vineyard Avenue" is not yet so designated. The use of the

abandoned segment of Vineyard Avenue as a potential recreational path is discussed in the context of impacts associated with Alternative S2 (which is the applicable alternative, not S1 as suggested in the comment, in Section C.11.3.3 (page C.11-26).

- 123-76 The Draft EIR text on page C.11-13 is changed from "Isabel Avenue Class I bike paths on a new segment between Vineyard Avenue and Staley Boulevard." to "Isabel Avenue Class I bike paths on a new segment between Vineyard Avenue and Stanley Boulevard."
- 123-77 See Response to Comment s 123-31 and 123-37.
- 123-78 Section D of the Draft and Final EIRs each present discussion of the comparison of alternatives.

# H.5 RESPONSES TO COMMENTS MADE AT PUBLIC PARTICIPATION HEARINGS ON DRAFT EIR

#### FEBRUARY 8, 2001 PUBLIC PARTICIPATION HEARING: LIVERMORE

#### Mr. Douglas Goodman

- PPH-1 The visual resources analysis (Draft EIR Section C.12) acknowledges the potential visual impact of the various routes. In addition, the potential impacts to the Livermore Municipal Airport are acknowledged in Draft EIR Section C.7. See also Response to Comment A-3.
- PPH-2 The commenter's support for the Draft EIR's finding the No Project Alternative to be Environmentally Superior for the North Livermore and Phase 2 components is acknowledged.

## Mr. Patrick Duffy

- PPH-3 The Draft EIR acknowledges that the S1/S2/L2 Alternatives would create a significant impact in the areas of visual resources and recreation in the area of Sycamore Grove Regional Park (Sections C.7 and C.12). Draft EIR Section C.9 analyzed the potential noise impacts of the Proposed Project and alternatives and determined that the noise impacts would be less than significant.
- PPH-4 The commenter's preference for PG&E Co.'s Proposed Project is acknowledged.
- PPH-5 Please see General Response GR-1.
- PPH-6 Please see Response to Comment 39-1.

#### Mr. Ed Patriquin

PPH-7 The commenter's support for the S1 Alternative (erroneously called the S2A Alternative in the comment) is acknowledged. It should be noted that the existing 21 kV distribution on the east side of Isabel Avenue is not part of the Proposed Project and it could not be moved underground without cost participation from the City of Livermore, as required by CPUC Rule 20.

H-113

PPH-8 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged.

#### Mr. Cecil Beebe

PPH-9 Please see Response to Comment 49-3.

#### Ms. Brenda Engdahl

PPH-10 Please see General Response GR-4.

#### Mr. Richard Ward

- PPH-11 Please see Response to Comment 62-1.
- PPH-12 Please see Response to Comment F-7.
- **PPH-13** The comment is correct in stating that Vasco Road is an Alameda County Scenic Route. Specifically, the Phase 2 project would be inconsistent with the governing policy statement of the Scenic Route Element that states: "New overhead transmission towers and lines should not be located within scenic corridors when it is feasible to locate them elsewhere." Policy inconsistency (criterion #5 Visual Resources Section C.12.2.2, page C.12-21 of the Draft EIR) is identified as a circumstance potentially leading to a finding of a significant impact (depending on the language of the policy and the extent of project consistency or inconsistency). However, the viewshed within the scenic corridor in the vicinity of the Phase 2 crossing of Vasco Road has been substantially modified with the presence of the existing Contra Costa-Newark Transmission Line and the existing active landfill to the east. The Contra Costa-Newark line establishes visual elements in the landscape that would be similar to the Phase 2 structures in terms of character and scale and reduces the quality of the visible landscape in the immediate vicinity of the Phase 2 route crossing. The modified landforms of the landfill to the east also diminish the quality of the landscape within the corridor as viewed from Vasco Road. Therefore, although the Phase 2 route would be inconsistent with the scenic route policy pertaining to Vasco Road, the project would not substantially change the visual quality of the landscape at the Vasco Road crossing. The resulting impact associated with this policy conflict is considered adverse but not significant. It should be noted that this finding of non-significance at the Vasco Road crossing does not change the original conclusion presented in the Draft EIR (Visual Resources Section C.12.6.1.2) that overall, the Phase 2 route would result in significant and unavoidable (Class I) visual impacts between Interstate 580 and the Contra Costa Newark line.

Vasco Road is identified as a Scenic Route in the Scenic Route Element of the Alameda County General Plan. The proposed tap point for Phase 1 is roughly 400 feet west of the roadway, which would place it within the scenic corridor around Vasco Road, defined as "up to 1,000 feet from the roadway in rural areas having a high scenic quality." However, the transition structure would be obscured from view from the roadway by topography, being located on the west side of a saddle in the hillside flanking the roadway. On the other hand, the proposed Phase 2 transmission line would span the roadway, and would therefore be noticeable to passing drivers looking skyward, as well as to drivers approaching the crossing from the south (from the north, curves in the roadway in conjunction with intervening terrain would block approaching views). This would represent an impact not previously addressed in the Draft EIR. Therefore, the Draft EIR is hereby amended to read as follows:

page C.7-61:

# "C.7.6.1.2 Operation and Maintenance

# **Conflict with Alameda County Scenic Route Policy**

Similar to the impact identified for Alternative S1, implementation of the proposed Phase 2 transmission line would conflict with the Alameda County General Plan Scenic Route Element principle stating that new overhead transmission towers and lines should not be located within scenic corridors when it is feasible to locate them elsewhere. The Phase 1I line would cross Vasco Road, a designated Scenic Route, in conflict with the intent of the policy. The severity of this impact would be mitigated by several factors: (1) it would be located adjacent to an existing high-voltage transmission line corridor which crosses Vasco Road in several locations, including in close visual proximity to the proposed Phase 1I crossing; (2) the crossing point is immediately west of Vasco Road Landfill, which presents a view to drivers at this location of altered, artificial landforms with exposed slopes and waste collection and transfer trucks climbing and descending the hillside; (3) the line would not parallel the scenic corridor, but would merely cross it; and (4) due to the surrounding topography and the winding road, the transmission line crossing would be visible only briefly to passing motorists. Because the viewshed into which the Phase 1I line would be introduced is already substantially compromised and the introduction of the line would not substantially degrade existing visual conditions, this would be an adverse, but not significant impact (Class III)."

PPH-14 The commenter's preference for the Environmentally Superior Project in the North Livermore area is acknowledged.

## Mr. Matt Barry

- PPH-15 The commenter references an inadequate analysis of the S1 Alternative. Note that the Draft EIR included detailed analysis of all alternatives; the following sections of the Draft EIR include environmental impact analyses specific to the S1 Alternative: C.2.3.2, C.3.3.2, C.4.3.2, C.6.3.2, C.7.3.2, C.8.2.3, C.10.3.2, C.11.3.2 and C.12.3.2.
- PPH-16 Please see General Response GR-4.3 regarding noise impacts on Isabel Avenue.
- PPH-17 Please see General Response GR-4.
- PPH-18 CEQA Guidelines are not specific as to <u>how</u> an alternative should reduce or eliminate impacts of the Proposed Project. EIR preparers included the S1 Alternative because this route avoids the use of open space south of Pleasanton, the smaller residential streets of Kottinger Ranch where construction impacts would be more disturbing, and uses some existing utility corridors (Vineyard Avenue and Stanley Boulevard).

## Ms. Leslie Pickett

PPH-19 Please see General Response GR-4.

## Mr. Gene Broadman

PPH-20 Please see Response to Comment 108-1.

#### Ms. Shawn Zovod

- PPH-21 Please see General Response GR-4.
- PPH-22 Neither the S1 nor the L2 Alternative alignments would be located within the storage ponds comprising the planned Chain of Lakes. Along Isabel Avenue, the support towers would be located on solid ground that would not be excavated by the ongoing quarry operations and would not be within the pond areas in the Chain of Lakes. Along Stanley Boulevard, the support towers would be located adjacent to the existing railroad right-of-way. This area would remain outside the Chain of Lakes area.
- PPH-23 Please see General Response GR-4.

#### Mr. Richard Lee

- PPH-24 Please see Response to Comment 11-9 regarding the CPUC's compliance with CEQA Draft EIR notification requirements.
- PPH-25 The commenter's opposition to the S1 Alternative is acknowledged. PG&E Co.'s planning criteria are heavily weighted to considering cost as a factor in comparing alternatives. Cost is not considered in the CEQA process, except where it may be prohibitive and make an alternative infeasible. EIR preparers did not utilize PG&E Co.'s alternatives screening process, but evaluated alternatives independently. See also General Response GR-4.

#### Mr. Rick Camacho

- PPH-26 The commenter's opposition to the S1/L2 Alternative is acknowledged. Please see General Response GR-4.
- PPH-27 Please see Response to Comment A-14.
- PPH-28 Comment acknowledged. Please see General Response GR-4.

## Mr. Steve Simoni

PPH-29 Please see General Response GR-4.

## Ms. Mardi Landes

PPH-30 Please see General Response GR-4.

## Mr. Fred LaMonica

- PPH-31 Please see Response to Comment 11-9 regarding notification and General Response GR-4 regarding the S1 Alternative.
- PPH-32 Please see General Response GR-3.
- PPH-33 Please see General Response GR-1.
- PPH-34 Note that the S5 Quarry Route Alternative has been added to the Final EIR (see Section B.4). Regarding the future Chain of Lakes that will be established west of Isabel

Avenue and north of Stanley Boulevard, it should be noted that these quarry properties will eventually be deeded to Zone 7 of the Alameda County Flood Control and Water Conservation District for use as water management facilities. It is expected to be another 30 to 50 years before the lakes are fully developed, and it is unlikely that they will be publicly accessible. They are not and have not been intended to serve primarily as recreational facilities. Any limited recreational use that Zone 7 decides to permit along the edges of the lakes will be subservient to the lake's primary function as water management/storage facilities.

- PPH-35 Please see Response to Comment A-3.
- PPH-36 Please see Response to Comment 11-9 regarding notification. The commenter's opposition to the S1 Alternative is acknowledged. Please note the Draft EIR was released on December 26, 2001, not in November as the commenter stated.

#### Mr. Chris Fednoiw

PPH-37 Please see General Response GR-4.

#### Ms. Betsy Wilson

PPH-38 Please see General Response GR-4 regarding the S1 Alternative and Response to Comment 11-9 regarding notification.

#### Ms. Teresa Win

PPH-39 The comment addresses concern about potential property value impacts of the transmission line. See General Response GR-3 and visual analysis, Draft EIR Section C.12. It is not clear what segment the comment addresses, and whether that segment will be utilized in an above ground right-of-way.

#### Mr. Eric Simonds

- PPH-40 The PG&E Co. project that was ongoing at the time the comment was made was the reconductoring of the Tiger Creek 230 kV line (Tesla-Newark) which PG&E Co. completed as a result of an order from the California Independent System Operator. PG&E Co. filed an Advice Letter to notify the public of this action (including a newspaper advertisement), as required by the CPUC. The Proposed Project for the Tri-Valley must comply with the CPUC's requirements for a Certificate of Public Convenience and Necessity, and PG&E Co. is complying with those requirements.
- PPH-41 All of the existing towers in the Tesla-Newark transmission corridor are being used and are important to regional electric reliability. The towers in the Stanislaus Corridor itself could be removed, as is proposed as part of the Stanislaus Corridor Alternative.

## Mr. Ralph Moir

PPH-42 The S2A Alternative has been modified (see Sections B.2 and C.1 of the Final EIR) but it still remains underground. The commenter's preference for this alternative over the overhead portion of S1/S2/L2 Alternative southeast of the intersection of Highway 84 and Vineyard Avenue is acknowledged.

H-117

# Mr. Phil Wente

PPH-43 The Draft EIR explains the history of PG&E Co.'s proposals for transmission upgrades in this area in Section A.1. The Advisory Group referenced in this comment was a group organized by PG&E Co. to obtain input into their route development process, which preceded their Application to the CPUC and resulted in identification of PG&E Co.'s Proposed Project. This group's input was only relevant before PG&E Co.'s application was submitted. After submittal of the Application, PG&E Co. is not involved in the alternatives identification process except in the same manner as the public. The CEQA process has been underway since April 2000 to evaluate the Proposed Project and to develop alternatives. As described in Final EIR Section G, public input has been sought throughout the CEQA process, starting with a series of Scoping Meetings in May 2000. These meetings were announced in newspaper advertisements and via a mailing to approximately 1,100 public agencies and individuals. Records indicate a notice of the meeting was mailed to Gresta Blanca Golf, LCC, at 5565 Tesla Road in Livermore, which is the same address as that listed on the commenter's winery stationary.

It should be noted that the Stanislaus Corridor Alternative to Phase 2 of the Proposed Project was not found to be the Environmentally Superior Alternative (the Switching Station Alternative was identified as superior).

- PPH-44 Please see Response to Comment 49-3 regarding the commenter's suggestion of a new alternative.
- PPH-45 The commenter's reference to the Conde Nast Traveler article is acknowledged.
- PPH-46 The potential removal of existing 60 kV towers is addressed in Final EIR Section B.7.
- PPH-47 The Draft EIR (Section A.1) acknowledges the history of PG&E Co.'s previous transmission line proposals in the Pleasanton area.

## Mr. Sanchez

PPH-48 Please see General Response GR-4.

# Mr. Bob Harris

PPH-49 The commenter is correct that the Proposed Route and the P1, P2, and P3 Alternatives would all serve the Proposed North Livermore Substation location. The commenter's opposition to the L1 and L2 Alternatives is acknowledged.

## Mr. Phil Unterreimer

PPH-50 Please see General Response GR-4.

## Ms. Cathie Brown

- PPH-51 The following outlines the ongoing communication between the CPUC, Aspen Environmental Group (EIR preparers) and the City of Livermore during the scoping process and preparation of the Draft EIR.
  - On April 21, 2000 the Notice of Preparation for the Tri-Valley 2002 Capacity Increase Project was mailed to Mayor Cathie Brown; Mr. Marc Roberts, Associate Planner for the City of

Livermore; Jerry Peeler, City of Livermore City Manager; and the members of the City of Livermore City Council.

- On May 31, 2000, the CPUC and Aspen Environmental Group met with Mr. Will Kettler of the City of Livermore to discuss the project and potential EIR alternatives. Communications with Mr. Kettler were maintained, i.e. phone conversations, throughout the summer of 2000 to discuss EIR alternatives.
- On July 24, 2000 the Tri-Valley 2002 Electric Power Capacity Increase Project Environmental Impact Scoping Report was mailed to Mayor Cathie Brown; Mr. Marc Roberts, Associate Planner for the City of Livermore; Jerry Peeler, City Manager for the City of Livermore; the members of the City of Livermore City Council; Mr. William Kettler, Associate Planner for the City of Livermore; and Mr. Jim Perry of the City of Livermore.
- On July 26, 2000 Aspen Environmental Group sent a letter to Mr. Marc Roberts, Associate Planner for the City of Livermore, requesting a list of projects in the area that could affect the region in combination with the Proposed Project or alternatives. These projects could range from single-family housing developments and road improvements to large commercial development projects that were approved and under construction or not yet approved but under environmental review. Projects were to be within one half mile of the Proposed Project or alternatives shown on the map provided. The S1 Alternative was plotted on the map provided to the City of Livermore. On September 21, 2000, Aspen Environmental Group received the information requested from Mr. William Kettler, Associate Planner for the City of Livermore.
- On November 9, 2000 the Tri-Valley 2002 Capacity Increase Project Newsletter was mailed to Mayor Cathie Brown; Mr. Marc Roberts, Associate Planner for the City of Livermore; Jerry Peeler, City Manager for the City of Livermore; the members of the City of Livermore City Council; and Mr. William Kettler, Associate Planner for the City of Livermore.
- On December 15, 2000, the Notice of Availability of the Draft EIR for the Proposed Tri-Valley 2002 Capacity Increase Project was mailed to Mayor Cathie Brown; Mr. Marc Roberts, Associate Planner for the City of Livermore; Jerry Peeler, City Manager for the City of Livermore; the members of the City of Livermore City Council; and Mr. William Kettler, Associate Planner for the City of Livermore.
- On December 26, 2000, the Draft EIR itself was sent to the City.
- PPH-52 Comment acknowledged.
- PPH-53 Regarding the potential conflict with Livermore Airport flight paths, please see Responses to Comments A-14 and A-16. Regarding the visual issues raised in the comment, please see General Response GR-4. Regarding the scenic corridor issue, please see Response to Comment A-3. Potential impacts to the wildlife habitat adjacent to the Alternative L1 alignment are addressed in Section C.3.5.4 of the Draft EIR.

H-119

#### Mr. John Stein

PPH-54 Please see Response to Comment A-16.

#### Mr. Jim Carley

PPH-55 See the Draft EIR discussion of bird electrocution under C.3.2.5.2 *Wildlife*.

## Mr. Kurtzer

PPH-56 The S2A Alternative has been modified (see Final EIR Sections B.2 and C.1), but still remains underground outside of Sycamore Grove Park boundaries. The commenter's preference for the S2A and S4 Alternatives is acknowledged.

# FEBRUARY 13, 2001 PUBLIC PARTICIPATION HEARING: PLEASANTON

## Mr. Randall Frost

PPH-57 Please see General Response GR-1.

# Ms. Diane Burton

PPH-58 Please see General Response GR-1.

- PPH-59 Comment addresses concern that a new power line will lower real estate values. See General Response GR-3.
- PPH-60 Please see Response to Comment 106-2

# Mr. Kenneth Burton

- PPH-61 Please see General Response GR-1.
- PPH-62 The preferred route will not result in significant impacts to waterfowl or sandhill cranes. Impacts to biological resources associated with the Proposed Route or S4 route are greater than those associated with routes through developed areas.

# Mr. Bing Hadley

PPH-63 The Draft EIR addressed the issue of the potential for landslides and debris flows along the Proposed route south of the transition structure in Section C.5.1.2.1 by describing the existing mapping of the area as published by the CDMG and the USGS (See Response to Comment P-14). The existing hazards are to be minimized by implementing of Applicant Proposed Mitigation Measures 13.3 and 13.9, requiring design-level geotechnical investigations to evaluate the surface and subsurface conditions, "identify potential hazards, evaluate the potential for unstable slopes, landslides, mudflows, and debris flows along the approved routes" (Draft EIR, Table C.5-2, pages C.5-25 and 26). Where necessary, "[f]acilities will be located away from steep hillsides, debris flow source areas, the mouths of steep sidehill drainages, and the mouths of canyons that drain steep terrain" (Id.). The Proposed tower locations are located away from existing landslides, except for the northernmost tower, just south of the transition structure. This proposed tower must be placed on a very large older landslide with deep foundations to avoid extensive movement should the landslide be reactivated.

The construction of an all-weather access road for construction and maintenance of this portion of the Proposed route is discussed in Response to Comment P-14, and an additional Mitigation Measure is proposed to lessen the impacts of the construction of this road.

- PPH-64 Comment acknowledged. Also, Figure B-11 of the Draft EIR identifies the location of the gravel access roads and non-graded cross-country roads that would be necessary for the Proposed Project.
- PPH-65 See Response to Comment PPH-63, above. The Proposed underground route runs along the ridgeline to minimize the steepest of the terrain and avoid several mapped landslides.
- PPH-66 Pursuant to Mitigation Measure S-1 (see page C.10-13 of the Draft EIR), PG&E Co. will be required to coordinate with all local jurisdictions and agencies responsible for all underground utilities in order to define the exact placement of the underground transmission line. See also Response to Comment P-7.

With regard to potential road failure, pursuant to Mitigation Measure T-4 (see page C.11-20 of the Draft EIR), PG&E Co. would be required to ensure the long-term protection of all road surfaces disturbed by construction activities or construction vehicles by coordinating repairs with the affected public agencies to ensure that impacts to area roads are adequately repaired.

PPH-67 PG&E Co.'s engineering diagrams that have been developed after release of the Draft EIR illustrate that the Proposed Route can be constructed within the utility rights-of-way of the streets in Kottinger Ranch. These diagrams were filed as part of the CPUC's General Proceeding (Rebuttal Testimony of PG&E Co., February 14, 2001).

# Ms. Glenda Schwem

- PPH-68 Please refer to Response to Comment G-2.
- PPH-69 Please see Response to Comment G-2.
- PPH-70 Impact 11-5, on page C.11-21 of the Draft EIR, addresses restricted access to properties. Mitigation Measures T-5 and T-6 would reduce potentially significant impacts associated with property access for residents and emergency vehicles along the underground transmission route in Pleasanton at Benedict Court, Smallwood Court, Hearst Drive and associated cul-de-sac, and Bernal Avenue to less than significant levels. Of particular note is Mitigation Measure T-6's requirement that at least one access driveway is left unblocked during all business hours or hours of use during construction on or adjacent to sensitive land uses, including hospitals, schools, residences, major employers and recreational areas. Please also see Response to Comment P-19.

As described in Draft EIR Section C.2.3.1, Applicant Proposed Measures 10.1a through 10.1k in addition to Mitigation Measures A-1 through A-4 would reduce particulate emissions to a level that is not significant (i.e., a threat to public health).

PPH-71 After submittal of its Application, PG&E Co. was not involved in the alternatives identification process except to provide technical/feasibility input or in the same manner as the public. The CEQA process, with the CPUC as the Lead Agency, has been underway since April 2000 to evaluate the Proposed Project and to develop alternatives. Please note the Draft EIR did not identify Proposed Project as the Environmentally Superior Project in Pleasanton, rather the S2 Alternative. The comment regarding keeping the lines out of residential areas is acknowledged.

## Mr. Schwem

- PPH-72 Please see General Response GR-2.
- PPH-73 The cost of the Proposed Project or alternatives will be considered in the CPUC's general proceeding and is not within the scope of this EIR.
- PPH-74 Mitigation Measures presented in the Draft EIR, along with construction practices employed by PG&E Co. (as stated in Applicant Proposed Measures throughout Section C of the Draft EIR) would ensure that homes would not be unusable during project construction. See especially Mitigation Measures for traffic and access impacts in Final EIR Table F-3.

## Ms. Colleen Nespar

- PPH-75 The Draft EIR acknowledged the Vineyard Corridor Specific Plan (see Sections C.7 and C.11) and the potential impacts of the S2 Alternative on that area. In addition, the Final EIR considers use of "New Vineyard Avenue" rather than "Old Vineyard" to reduce impacts on the existing and future Old Vineyard homeowners and future school.
- PPH-76 Please see General Response GR-1.

# Mr. Larry Snyder

PPH-77 Although temporary lane closures would be required during construction of the Proposed Project, no streets would be closed. As noted in Section C.7.3.1.1 (page C.7-43) and Section C.11.3.1.1 (page C.11-21), access to some individual residential driveways would be temporarily blocked during construction, though residents would still have access to their homes by foot during these periods. Mitigation Measures (T-5 and T-6) are identified on page C.11-21 to reduce this potentially significant impact to a less-thansignificant level.

The commenter's point regarding a perfect line for the underground alignment is not clear. The alignment would follow the contours of the streets in which it is located, and would curve with the curve of the street. Wide radius curves would be required for 90-degree turns. Regarding the presence of children along the alignment, please see General Response GR-1.

PPH-78 Please see General Response GR-2.

## Mr. Phil Richardson

PPH-79 Please see General Response GR-2.

## Ms. Susan Astbury

PPH-80 Please see General Responses GR-1 and GR-2.

## Mr. Matt Sullivan

PPH-81 The Draft EIR addresses demand-side measures to conserve electricity as a component of the "No Project Alternative" (see Draft EIR Section B.7.2). Energy conservation is considered essential in California in order for the existing infrastructure to effectively serve the population, but with the current and future growth, new projects such as PG&E Co.'s Proposed Project are considered essential. Please see Draft EIR Section A.2 regarding project need. Demand-side measures cannot meet project objectives by saving sufficient energy to make this project unnecessary.

## Mr. Paul Harris

- PPH-82 The commenter's opposition to the Proposed Project in Pleasanton is acknowledged. Please see Response to Comment 78-2 regarding PG&E Co.'s testimony referenced in the comment. The commenter's recommendation to place the transition station at a location that cannot be viewed from within Pleasanton's urban growth boundary is acknowledged, and the potential visual impact of the overhead structures is acknowledged in Draft EIR Section C.12.3.4 with Mitigation Measure V-2.
- PPH-83 The commenter's recommendation to route the line along new Vineyard Avenue or underground through Shadow Cliffs Regional Park to Stanley Boulevard is acknowledged. Please note that a route along the new Vineyard Avenue is analyzed in the Final EIR (see Sections B.3 and C.2).

## Dr. Doug Huey

PPH-84 Please see General Response GR-1.

## Ms. Carla Brown-Belcher

- PPH-85 Please see General Responses GR-1 and GR-2.
- PPH-86 Section C.7 of the Draft EIR, Land Use and Recreation, goes into considerable detail in discussing the general plans and zoning ordinances of the cities and counties that would be traversed by the Proposed Project or alternatives to the project, and numerous impacts are identified in Section C.7.2 related to inconsistencies with general plan policies. No impact related to inconsistency with the *Pleasanton General Plan* was identified because the Proposed Project is consistent with that document. Contrary to the commenter's assertion, the project would not change the character of the residential neighborhood that it would traverse. The transmission line would be placed underground, and would have no effect whatsoever on the neighborhood, other than the temporary disruption of construction, which is discussed in Impacts 7-1, 7-2, and 7-3. Mitigation Measures L-1, L-2, T-5, and T-6 are recommended to reduce those impacts to acceptable levels.

Regarding the easement, the primary purpose for the easement is to provide a legally entitled right-of-way through which to run important infrastructure such as sewers and electric power lines and to provide access for maintenance purposes. Placing a 230-kV transmission line underground achieves the same goal as placing a 60-kV distribution line underground: it removes the line from prominent view. In these regards, the construction of the proposed underground transmission line would seem consistent with the original intent behind granting PG&E Co. an easement through the street rights-of-way.

PPH-87 The commenter's opposition to PG&E Co.'s Proposed Project in the Pleasanton Area, specifically in residential neighborhoods, is acknowledged.

H-123

PPH-88 The commenter's concern about setting a precedent for transmission line siting in residential areas is acknowledged. The Draft EIR's conclusions regarding the Environmentally Superior Alternative reflected the community's serious concerns, heard during EIR Scoping and since.

# Ms. Kathy Antrum

PPH-89 Please see General Response GR-1.

# Mr. Chris Gray

PPH-90 Supervisor Haggerty's strong interest in an alternative route that does not go through residential neighborhoods is acknowledged. The Draft EIR's conclusions regarding the Environmentally Superior Alternative reflected the community's serious concerns on this topic, heard during EIR Scoping and since.

# Ms. Carolyn Newton

PPH-91 Please see responses to Ms. Newton's written comments, at Comment Set 29.

# Ms. Jeannie Pullen

PPH-92 Please see General Response GR-1.

# Mr. Doug Evans

- PPH-93 Please refer to Response to Comment PPH-70.
- PPH-94 Please refer to Response to Comment PPH-70.
- PPH-95 There is no requirements for routine transmission line maintenance that would require streets to be dug up. This would only occur if a significant failure occurred on the line. Please see General Response GR-2.
- PPH-96 Please see General Responses GR-1 and GR-2.
- PPH-97 Please see Response to Comment 29-2. The commenter's support for alternative routes that avoid residential neighborhoods, in spite of potentially higher costs, is acknowledged. The Draft EIR's conclusions regarding the Environmentally Superior Alternative reflected the community's serious concerns on this topic, heard during EIR Scoping and since.

## Ms. Jackie Evans

PPH-98 Please see General Responses GR-1 and GR-2.

## Ms. Sharon Heinz

PPH-99 Comment acknowledged. The commenter's interests in preserving the progress made in planning balanced development in her community is acknowledged. The Draft EIR's conclusions regarding the Environmentally Superior Alternative reflected the community's serious concerns on this topic, heard during EIR Scoping and since.

PPH-100 The commenter's concern about the electric facility siting process is acknowledged; please see Section G in the Final EIR for a complete description of the public participation process employed by the CPUC for this project.

#### Ms. Michelle LaMarche

- PPH-101 Comment acknowledged. This comment about the current political climate and potential pressure to site energy facilities will be considered by the CPUC in the General Proceeding for this application. Please see Draft EIR Section A.1 for a description of the CPUC's decision-making process and statutory conditions.
- PPH-102 Please see General Response GR-1.
- PPH-103 The reliability/operational efficiency tradeoffs of overhead vs. underground lines is a factor that the CPUC will consider in the General Proceeding for PG&E Co.'s application.
- PPH-104 Please see General Responses GR-1 and GR-2.
- PPH-105 The commenter's support for alternatives located in commercial or industrial areas "where those companies are getting the benefit of most of this power" is acknowledged, and is reflected in the CPUC's development of alternatives (e.g., Alternatives D1 and L2).

#### Mr. Michael Rogers

- PPH-106 The risk of seismic hazard was addressed in Draft EIR Section C.5.3.1.1.
- PPH-107 Please see General Response GR-1.
- PPH-108 All of the environmental impacts referenced in this comment were evaluated in the Draft EIR. The commenter's concerns about finances associated with the project and being used as guinea pigs are appropriately within the sphere of the CPUC's General Proceeding for this application. See also General Response GR-2.
- PPH-109 Please see General Responses GR-1 and GR-2.
- PPH-110 The concerns referenced in this comment are appropriately within the sphere of the CPUC's General Proceeding for this application. The CPUC's public participation program for this EIR process is described in Final EIR Section G.

#### Ms. Sharon Heinz

PPH-111 The background on the previous PG&E Co. application considered by the CPUC in 1988, referenced in this comment, was included in Draft EIR Section A.1.

#### Ms. Kara Simone

PPH-112 Please see Response to Comments P-3 and 54-12.

## Ms. Michelle Antilla

PPH-113 Please see Response to Comments P-2, P-3 and P-4.

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# Ms. Claire Leibowitz

- PPH-114 The commenter is correct that the *Vineyard Avenue Corridor Specific Plan* sets forth the City of Pleasanton's intention to realign Vineyard Avenue to the north and to convert the existing roadway to a pedestrian, bicyclist, and equestrian corridor. The Specific Plan also states that this corridor is intended to provide emergency vehicle and utility maintenance vehicle access. In Section C.7.3.3 the Draft EIR identifies an impact (Impact 7-16) on the future elementary school from project construction, and recommends Mitigation Measure L-12 to eliminate the impact. However, following construction, the presence of the underground transmission line would be consistent with the utility corridor planned for the existing Vineyard Avenue alignment. This use would not affect the residential homes that would be located to the north and south of the alignment, nor would it affect Ruby Hills residents. Regarding health risks, please see General Response GR-1.
- PPH-115 EIR preparers are aware of the proposed Neal Elementary School. Note that the Final EIR considers a "New Vineyard Avenue" alternative route that would locate the transmission line further from school buildings (see Section B.3 and C.2). Temple Beth is listed in Draft EIR Table E.3-1 as a project that could create cumulative impacts in conjunction with the Proposed Project; cumulative impact analysis is presented in Draft EIR Section E.4.

# Mr. Eric Weasner

PPH-116 The commenter's opposition to the S1 Alternative along Isabel Avenue is acknowledged. Please also see General Response GR-1 regarding EMF.

# Mr. Chris Voightsberger

PPH-117 Please see General Response GR-4.

## Ms. Sandra Bierre

- PPH-118 The commenter's support in increasing public awareness and access to government decision-making is appreciated. The CPUC's public participation program for this EIR process is described in Final EIR Section G.
- PPH-119 The commenter touches upon an issue which has been brought to high relief by this project that local development planning has not adequately considered and provided for the electrical infrastructure needed to support the development being planned and approved. The need for the Tri-Valley 2002 Capacity Increase Project is discussed in the Draft EIR at Section A.2, and the genesis for this project pre-dates PG&E Co.'s current financial difficulties by at least two years.
- PPH-120 The commenter's interest in making use of undeveloped land is acknowledged, however the CPUC strives to meet a general planning standard to consolidate utilities in existing utility and transportation corridors as much as possible in order to avoid/minimize further land use conflicts.

## Mr. Ed Patriquin

- PPH-121 PG&E Co.'s Rebuttal Testimony, filed with the CPUC on February 14, 2001, specifically addresses the concerns about adequate space being available in the streets of Pleasanton. In most cases, the transmission line route would be on the opposite side of the street from homes.
- PPH-122 Please see Response to Comment P-1 and General Response GR-4 regarding undergrounding on the west side of Isabel Avenue (Alternative S1).
- PPH-123 Please see Response to Comment P-1 and General Response GR-4 regarding undergrounding on the west side of Isabel Avenue (Alternative S1).
- PPH-124 Please see Response to Comments PPH-88 and PPH-97.

# Mr. Fred La Monica

- PPH-125 Please see General Response GR-1 regarding EMF and General Response GR-3 regarding property value.
- PPH-126 Please see General Response GR-4.

# Ms. Shawn Zovod

PPH-127 Please see General Response GR-4.

## Mr. Will Kettler

- PPH-128 Please see Response to Comment A-3.
- PPH-129 Alternative S2A was developed as a variant to Alternatives S1/S2/L2 specifically to avoid crossing Sycamore Grove Regional Park, and at the time of publication of the Draft EIR, it was believed to accomplish that objective. Now that this conflict has been identified, a modification of the S2A Alternative has been developed which entirely avoids the park. The modification is evaluated in Section B of this Final EIR.
- PPH-130 Please see Responses to Comments PPH-27 and PPH-54.
- PPH-131 The City of Livermore's preference for the P3 and P2 Alternatives and opposition to the L1 Alternative is acknowledged. Please note the P3 Alternative has been modified; see Section C.4 of this document. Also, please see the responses to the City's written comments, at Comment Set A.

## Mr. Mark Beckworth

- PPH-132 Comment addresses concern that property values will go down as a result of proximity to an underground transmission line. See general comment above. In addition, review of literature on property value impacts of transmission lines does not include consideration of underground lines, from which there is an expectation that visual and thus economic impacts would be minimized.
- PPH-133 Comment acknowledged. Please see Response to Comment PPH-97.

## Mr. Randy Lum

- PPH-134 The City of Pleasanton's opposition to the Proposed Project and S2 Alternative is acknowledged. Please see the responses to the City's written comments, at Comment Set P, particularly Response to Comments P-1, P-2, and P-3.
- PPH-135 Please see Response to Comment PPH-134, also noting Response to Comments P-4 and P-12.
- PPH-136 The commenter's opposition to the D1 Alternative in Dublin is acknowledged.

# FEBRUARY 15, 2001 PUBLIC PARTICIPATION HEARING: DUBLIN

## Mr. Dave Hudson

- PPH-137 The City of San Ramon's Resolution No. 99-125 supporting the Proposed Project is acknowledged.
- PPH-138 The commenter's opposition to the D2 Alternative in San Ramon is acknowledged.
- PPH-139 The City of San Ramon's preference for the Proposed Project is acknowledged. Please see General Response GR-5 regarding the necessary regional approach to electric power infrastructure, also Response to Comments J-18 and J-21.

# Mr. Dan Rodrigues

PPH-140 The commenter's preference for the Proposed Project is acknowledged.

# Ms. Carol Cirelli

- PPH-141 Please see the responses to the City of Dublin's written comments at Comment Set J, and as more specifically addressed in the following PPH comments by the City.
- PPH-142 Please see Response to Comment J-2.
- PPH-143 Please see Responses to Comments F-3, J-2, and J-3.
- PPH-144 See Response to Comment J-5. The statement that "PG&E [Co.]'s Proposed Project would not result in significant geology or soils impact compared to the Environmentally Superior Alternative because the projects underground lines would generally traverse stable, well-settled soils" is misdirected because the portion of the transmission line which traverses the aggregate operations is intended to replace the Proposed Dublin Substation and overhead transmission line, not the Proposed underground transmission line through the hills south of Pleasanton. The response, however, will cover both aspects of interpreting the comment.

First, only the segment of the Proposed underground transmission line shared with the S2/S4 "Environmentally Superior Alternative" and along Bernal Avenue north of Kottinger Drive, is on "stable" soils, and nearly level terrain. However, south of Kottinger Drive, and the remainder of the route, within the roadways of Bernal, Hearst, Smallwood, and Benedict, follows along increasingly steep terrain, and in relatively newly constructed streets. The "stable" soils along Smallwood Drive and Benedict Court, between approximately Milepost M3.6 and Milepost 4.0 are described by the

USGS as being "mostly landslide" (Wentworth, et al., 1997; Draft EIR, page C.5-6). The remainder of the underground portion of the Proposed transmission line, within the hills south of the Kottinger Ranch development, is also through soils classified as "mostly landslide" (Id.). Several of the other comments discuss settlement or fill-failure issues with the Proposed route along Benedict Court and below the water tank, south of the development. (See also Response to Comment PPH-69.)

Second, the portion of the Proposed Project which the D1 route replaces is located in the hills north of Dublin, and does not contain any underground segments to which the comment refers.

- PPH-145 Alternative S2A was developed as a variant to Alternatives S1/S2/L2 specifically to avoid crossing Sycamore Grove Regional Park, and at the time of publication of the Draft EIR, it was believed to accomplish that objective. Having subsequently learned that in fact Alternative S2A would be located within Sycamore Grove, the EIR preparers developed a new variant to the S1/S2/L2 Alternatives which entirely avoids the park as well as the treatment plant and adjacent lands owned by the Zone 7 Water Agency. The new alternative is described in Section B and evaluated in Section C of this Final EIR.
- PPH-146 Please see Response to Comments J-15 and J-6.
- PPH-147 Please see Response to Comment J-12.
- **PPH-148** While the Proposed Project would traverse open space/grazing land through North Livermore, it would be highly visible to residential development that has been planned for the area south of May School Road. While the passage of Measure D in Alameda County in the November 2000 election removed the County's participation in that planning process, the City of Livermore is proceeding with development of a specific plan for North Livermore, and still anticipates residential and retail development of the area. The very open space nature of the proposed northern alignment would serve to heighten its visibility and exacerbate its visual impact. By contrast, there would be no visible overhead line in Dublin associated with the D1 Alternative, and the substation site could be enclosed and/or screened from view from the residential development planned for the area north of Dublin Boulevard. In addition to the significant visual impacts identified for the proposed overhead transmission line across the North Livermore Valley, the Draft EIR identified impacts associated with the location of the alignment within a planned regional trail right-of-way and the location of the North Livermore substation within a planned greenbelt, as well as conflicts with a number of planning policies applicable to the area. In light of this, the CPUC respectfully disagrees with the assertion that the Proposed Project would have fewer impacts than the D1 Alternative.
- PPH-149 Please see Response to Comment J-18, as well as General Response GR-2 regarding underground 230 kV lines.
- PPH-150 The cost of land acquisition is not considered in the CEQA process. The CPUC's General Proceeding will consider potential impacts related to cost and schedule. See also General Response GR-3 regarding property values.
- PPH-151 Overhead lines are not inherently more reliable than underground lines. PG&E Co. has indicated that underground lines could take longer to repair; this is a function of the

amount of replacement materials stored and the potentially greater time to identify the location of the problem. The Proposed Route from North Livermore to the Proposed Dublin Substation would have substantially more severe environmental impacts than the D1 Alternative, as indicated in Draft EIR Table D-3.

- PPH-152 Please see Response to Comments J-19 and J-20.
- PPH-153 See Response to Comment 123-26 regarding Dublin Substation location. See also Response to Comments J-21 and J-22.

#### Mr. Peter Oswald

PPH-154 The commenter's support for the Tri-Valley 2002 Capacity Increase Project, in order to free up San Ramon Substation capacity presently used to support the Dublin/Pleasanton area so that said capacity is available for the future buildout of Bishop Ranch and Dougherty Valley. Please see Response to Comment J-21 on this subject. The CPUC appreciates Mr. Oswald's sharing his experience owning and managing the Bishop Ranch Business Park which has a 230 kV transmission line running through it, as well as with one running through his residential community of Blackhawk (no negative property value impacts).

#### Ms. Donna Dickey

- PPH-155 The commenter's desire for a separate public hearing in San Ramon is acknowledged. The CPUC must balance understandable local interests with time and cost considerations in scheduling hearings, and hoped that having the San Ramon community which is affected by one EIR Alternative (not found to be Environmentally Superior in the Draft EIR) come to the adjacent Dublin community (which is affected by three alternatives including one found to be Environmentally Superior in the Draft EIR) would not be too inconvenient.
- PPH-156 The commenter's remarks highlight the difficulty for decision-makers in weighing the impacts of different alternatives on different communities. This balancing is reflected in the Draft EIR's Comparison of Alternatives (Section D), and will be taken up by the CPUC in making a decision on PG&E Co.'s application.
- PPH-157 Please see Response to Comment PPH-139.

#### Ms. Christa Freihofner

PPH-158 The commenter's support for the Proposed Project in the Dublin/San Ramon area, and opposition to Alternative D-2 is acknowledged. Please see Response to Comment PPH-139.

## Mr. Jeff Haslan

- PPH-159 Please see Response to Comment 102-1 (to Mr. Haslan's written comments).
- PPH-160 Please see Response to Comment 102-2.
- PPH-161 Please see Response to Comment 102-4.

- PPH-162 Please see Response to Comment 102-3.
- PPH-163 Alternative D2 with Mitigation Measure A-6 rerouting, evaluated in the Draft EIR in Section C.13.3.3, accomplishes the commenter's suggestion.

#### Ms. Susan Mills

PPH-164 As described in the Draft EIR at p. ES-6, and at p. B-55 (Section B.6.2.2), Alternative D2 includes undergrounding of the 230 kV line in the westernmost one mile of the route, staring east of the ridgeline and continuing into the San Ramon Substation, in order to minimize visual impacts. Regarding underground line safety, please see General Responses GR-1 and GR-2.

#### Ms. Diane Clark

PPH-165 The feasibility if the S1 Alternative, as proposed by the CPUC, as an entirely underground route is discussed in detail in General Response GR-4.

#### Mr. Chris Feduniw

- PPH-166 Please see Response to Comment PPH-51
- PPH-167 As a point of clarification, the author of the Visual Resources section did not attend the information sessions. Also, the S1 visual impact assessment acknowledged available views from the upper rear windows of residences. The discussion of project visibility has been further expanded in General Response GR-4 regarding Isabel Avenue.
- PPH-168 The CPUC regrets that the commenter could not obtain the information he sought at the Draft EIR information meetings. The dimensions of the proposed 230 kV overhead lines and poles are provided in the Draft EIR at several locations: Table B-1 (at p. B-4), and Figures B-3, B-6 and B-7. Section C.12 (Visual Resources) also provides several photographs and photosimulations of overhead lines and poles.
- PPH-169 Please see General Response GR-4 regarding the S1 Alternative. The Draft EIR provides detailed analysis of this alternative in Section C.
- PPH-170 This request is appropriately within Administrative Law Judge Cooke's discretion to address.

#### Mr. Bob Harris

- PPH-171 The commenter's preference for the Proposed Project in eastern Dublin is acknowledged. Please see Response to Comment J-15.
- PPH-172 The commenter's opposition to Alternative D1 is acknowledged. Please see Response to Comment J-13.
- PPH-173 The commenter's opposition to the D1 Alternative and request for elimination from further consideration is acknowledged. Please see Response to Comments J-15, J-18 and J-21.

H-131

## Mr. Michael Zischke

- PPH-174 The commenter accurately summarizes the status and findings of the Draft EIR.
- PPH-175 The commenter is correct that the Draft EIR did not find the S1 Alternative to be the Environmentally Superior Alternative.
- PPH-176 Please see Response to Comment 123-7.
- PPH-177 Based on field visits with PG&E Co. staff along the S1/Isabel Avenue corridor, the towers in this area could be located adjacent to existing quarry access roads where no current or future quarrying activity would occur. For that reason, the tower locations should be stable and no unusually deep foundations should be required. This alternative would be longer than the proposed route, as illustrated in Draft EIR Table ES-1. However, with its minimal underground construction, construction time would be reduced. Regardless, this alternative is not considered to be Environmentally Superior.
- PPH-178 The PG&E Co. representative states that the P3 May School Road route is Environmentally Superior in the North Livermore areas, whereas in fact, the No Project Alternative was determined in the Draft EIR to be the Environmentally Superior Alternative in this area. The P3 Alternative is the best of the "build" alternatives. It should be noted that the Proposed North Livermore Substation and the proposed overhead transmission lines leading to it in North Livermore are found in the Draft EIR to cause significant and unavoidable visual impacts, leading to the development of the P3 Alternative.
- PPH-179 The Draft EIR concluded that the D1 Alternative and substation location were clearly superior to the Proposed Substation site. The D1 transmission line route would be substantially shorter than the Proposed Route, and would traverse disturbed corridors as opposed to the open space that would be affected by the proposed transmission line route to the Proposed Dublin Substation site.
- PPH-180 The commenter's preference for the Proposed Project over the alternatives is acknowledged. Section D in the Draft and Final EIR document the rationale for the conclusions of these documents.
- PPH-181 The ISO has not directly concurred with PG&E Co.'s load forecasting, since the ISO has not completed independent load forecasts for different distribution substations, nor does it approve the forecasts that PG&E Co. has made. See the ISO comment letter (Comment Set C). The ISO generally relies on each utility to assess the loading at each substation. Based on data provided to the EIR team, there do not seem to be negative system or reliability impacts from not building the North Livermore Substation at this time. It appears that the North Livermore Substation (with the tap into the Contra Costa – Newark line) could be constructed at any point in the future without impacting the remainder of the Tri Valley project.