

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Brandon Liddell
Pacific Gas and Electric
77 Beale Street, San Francisco, California 94105
(Email: RJDt@pge.com)

February 7, 2019

Subject: Pacific Gas and Electric Company Martin Substation Extension/Egbert Switching Station Project (Application No. 17-12-021) - Data Request No. 5

Dear Mr. Liddell:

The California Public Utilities Commission's (CPUC's) Infrastructure Permitting and California Environmental Quality Act (CEQA) section has reviewed comments received during the Notice of Preparation 30-day public review period for the Egbert Switching Station Project (Martin Substation Extension) (proposed project). Based on review of the public comments, additional information regarding potential project alternatives is required. In summary, the San Francisco Planning Department as well as the development group, Mercy Housing, expressed concerns that segments of the proposed 230 kV Jefferson-Egbert transmission line near Sunnydale Avenue (specifically on Santos Street and Sunnydale Avenue), would conflict with existing plans for redevelopment of the Sunnydale HOPE SF housing project (see attached NOP comment letters). CPUC requests that PG&E provide additional route alternatives avoiding conflicts with the Sunnydale HOPE SF project.

We would appreciate your response in support of the analysis for the Egbert Switching Station Project (Martin Substation Extension) Environmental Impact Report alternatives evaluation. Please provide a written description of the alternative alignment route(s) and supporting GIS data. Please let us know when you can provide the requested information to CPUC Dudek. Upon receipt, CPUC will review and determine if additional information is required. At any point in this process, the CPUC reserves the right to ask for additional information.

If you have any questions regarding this letter or need additional information, please contact me at 415-703-1956 or eric.chiang@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Chiang', written over a horizontal line.

Eric Chiang, CPUC Project Manager

cc: Brandon Liddell (PG&E: via email)
Wendy Worthey and Rica Nitka (Dudek: via email)

Att.: Attachment A: NOP Comments Letters from San Francisco Planning Department

ATTACHMENT A

NOP Comment Letters

- *San Francisco Planning Department, December 14, 2018*
- *Mercy Housing, December 14, 2019*

ATTACHMENT A
Certificate of Public Convenience and Necessity – A.17-12-021
Egbert Switching Station Project (Martin Substation Extension)
Data Request No. 5



SAN FRANCISCO PLANNING DEPARTMENT

December 14, 2018

Egbert Switching Station Project
C/o Dudek
1630 San Pablo Avenue, Suite 300
Oakland, CA 94612

Subject: Response to Notice of Preparation of an Environmental Impact Report Regarding the Pacific Gas and Electric Company Egbert Switching Station (Martin Substation Extension) Project (A.17-12-021)

To Whom It May Concern:

Thank you for the opportunity to comment on the Notice of Preparation ("NOP") made by Pacific Gas and Electric Company ("PG&E") in connection with the Egbert Switching Station Project ("Project").

The City and County of San Francisco ("the City") responded to the Certificate of Public Convenience and Necessity ("CPCN") application PG&E made to the California Utilities Commission ("CPUC") for the same Project on February 16, 2018. **The City maintains strong concerns on the alignment proposed in this NOP.**

PG&E's proposed alignment of the Jefferson-Egbert Transmission Line, however, follows the current alignment of streets in the Sunnydale HOPE SF Project Area. Those streets are planned and approved to be realigned in the near future, largely with publicly funded sources. The Sunnydale HOPE SF site is generally bounded by Velasco Street on its south, Hahn Street on its east, and McLaren Park on its north and west. The City's HOPE SF Program is a major public housing revitalization project focused on some of the City's most underserved communities. As part of the HOPE SF Program, all streets within the Sunnydale HOPE SF site are planned to be reconfigured, realigned, and significantly improved with all new utilities infrastructure. Mercy Housing and Related California, the Co-development Project Sponsors for Sunnydale HOPE SF, are charged with coordinating the phased reconfiguration of streets, while ensuring that current public housing residents are provided new housing through the phased demolition of existing, substandard units and construction of new replacement public housing units. It is a delicate task that requires very tight coordination between public housing resident relocation, public noticing, demolition, site preparation, infrastructure construction, and building construction. Because the phasing of the work on Sunnydale HOPE SF is contingent on the availability of funding from a variety of largely public sources, construction schedules are subject to change within the next five to ten years, which could be difficult to coordinate with the preferred PG&E transmission line alignment.

www.sfplanning.org

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Dudek

Response to PG&E Egbert Switching Station NOP

December 14, 2018

PG&E proposes to install the new Jefferson-Egbert Line under the Sunnydale HOPE SF site on Santos Street between Geneva and Sunnydale Avenue, and on Sunnydale Avenue between Santos to Hahn Street. As noted above, these streets will be significantly redesigned and reconfigured. Any installation within these streets, if not properly coordinated with the Sunnydale HOPE SF construction, could mean delays for both the projects, and/or repeated disruptions for the Public Housing Residents of Sunnydale HOPE SF. While one of the potential alternatives of the NOP (Figure 3B) does show an alternative that would avoid Santos and Sunnydale by turning east on Blythdale then north on Hahn, this too is problematic because it is on a portion of the street that is actively being vacated through the City's legislative process and has received Planning Phase Approvals to construct 167 units of 100% affordable housing. In fact, any alternative that would install the transmission line under the Sunnydale HOPE SF streets would likely be problematic for the reasons stated above. The City requests that further alternatives be incorporated into the Project Description that avoids Sunnydale HOPE SF altogether and although the City has not conducted due diligence that supports consideration of streets adjacent to the Sunnydale HOPE SF site, such as Sawyer, Geneva and Velasco; we ask that those streets and similar streets that are not proposed to be realigned be considered outside of the Sunnydale HOPE SF project site.

The proposed Jefferson-Egbert Line alignment passes through John McLaren Park, a Recreation and Park Department park. McLaren Park is the department's second largest park and open space. With significant amount of natural areas, open space and recreation uses, the park is a special place and sensitive in nature. PG&E proposes to install the new Jefferson-Egbert Line under park roadways: on Visitacion Avenue between Hahn Street and Mansell Street, and on Mansell Street between Visitacion Avenue and University Street. The northern segment of Visitacion Avenue passes through a designated natural area.

Any installation within a Recreation and Park Department property must comply with "park purpose" requirements as per the San Francisco Charter. Accordingly, PG&E will need to apply for a revocable encroachment permit and provide project elements with a "park purpose" if the alignment passes through a Recreation and Parks property.

Recreation and Park Department supports our fellow City agencies in requesting that further alternative alignments for the Jefferson-Egbert Line be incorporated that avoids Sunnydale HOPE SF site, and that alternatives that pass through Recreation and Park property must be underground and under existing roadways.

Some of the other alternative alignments of the Jefferson-Egbert line also raise concerns. Figure 3A of the NOP shows an alternative configuration that would have the transmission line installed under Blanken Avenue, Executive Park Boulevard, Harney Way and Jamestown Avenue. Like the alignment under Sunnydale HOPE SF, this alternative would run under areas that are proposed for major new construction; the Executive Park area has been approved for approximately 2,000 new units and the Candlestick area is approved for approximately 7,200 new units along with a major commercial component. Like Sunnydale's streets, these areas' streets are proposed to be reconfigured and improved. For the Candlestick Point newly configured roads, the City has already reviewed 100% street improvements plans, the addition of 230kV duct bank along Harney

Dudek

Response to PG&E Egbert Switching Station NOP

December 14, 2018

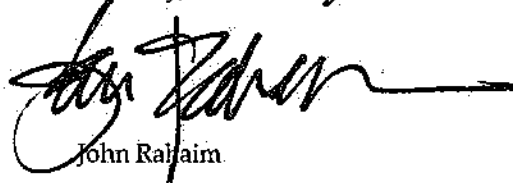
and Jamestown Avenue will be problematic due to space constraints and grading activities. Considering the current planning that I underway and the number of wet and dry utilities in this area this route would have many challenges and is not recommended.

Most significantly, Harney Way is proposed to be widened to include new bike and bus rapid transit facilities and Jamestown Avenue is proposed to be reconfigured so that it no longer meets Harney at its current location. Please consult with SFMTA, who is managing the proposed Harney Way project and the Office of Community Investment and Infrastructure ("OCII"), who is managing the Candlestick development project, regarding these respective projects. Like the City's request to consider additional alternatives that avoid Sunnysdale, the City requests that additional alternatives be considered outside of these areas as well.

Still, the City does support PG&E's overall project goal to improve grid reliability and looks forward to further collaboration with PG&E and stakeholders to mitigate any potential impacts or additional costs to City infrastructure and much-needed housing and capital improvement projects.

Please contact Mat Snyder at mathew.snyder@sfgov.org or (415) 575-6891 if you have any questions. We look forward to working with you and PG&E on this matter.

Sincerely,



John Rahaim

Director of Planning

cc: Brandon Liddell, Pacific Gas and Electric
Darin Cline, Pacific Gas and Electric
Dan Sider, Planning Department
Joshua Switzky, Planning Department
Lisa Gibson, Planning Department
Mat Snyder, Planning Department
Kate Conner, Planning Department
Nicholas Perry, Planning Department
Ken Rich, Office of Economic and Workforce Development
Robin Havens, Office of Economic and Workforce Development
Phillip C. Wong, Office of Economic and Workforce Development
Mara Blitzer, Mayor's Office of Housing and Community Development
Lydia Ely, Mayor's Office of Housing and Community Development
Erin Carson, Mayor's Office of Housing and Community Development

Dudek

Response to PG&E Egbert Switching Station NOP

December 14, 2018

Sara Amaral, Mayor's Office of Housing and Community Development

Theodore Miller, Office of the Mayor, HOPE SF

Tyrone Jue, Office of the Mayor

Derek Adams, San Francisco Public Utilities Commission

Sarah Jones, San Francisco Municipal Transportation Agency

Barbara Moy, Department of Public Works

John Thomas, Department of Public Works

Stacy Bradley, San Francisco Recreation and Park Department

Brian Stokle, San Francisco Recreation and Park Department

Sally Oerth, Office of Community Investment and Infrastructure

Lila Hussain, Office of Community Investment and Infrastructure

Jose Campos, Office of Community Investment and Infrastructure

GC: I:\Citywide\Community Planning\Southeast BVHP\HOPE SF\Sunnydale\Post Master Approval\misc\Sunnydale HOPE SF - PG&E Egbert Project - Response to NOP.doc



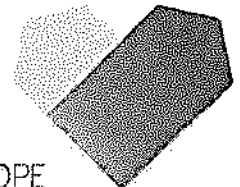
December 14, 2018

Egbert Switching Project
c/o Dudek
1630 San Pablo Avenue, Suite 300
Oakland, CA 94612

Re: PG&E Egbert Switching Station NOP Comments

On November 16, 2018, the California Public Utilities Commission ("CPUC") issued a Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Egbert Switching Station Project, CPUC Application 17-12-021. Mercy Housing California ("Mercy Housing") submits this letter to provide its comments regarding the potential impacts of a segment of the proposed Jefferson-Egbert transmission line, specifically the line segment proposed for Santos between Velasco and Sunnydale Avenue and Sunnydale Avenue between Santos and Hahn including the Sunnydale/Hahn intersection, and Mercy Housing requests that the EIR evaluate alternative routes for this segment of the transmission line that avoid construction in the Sunnydale/Velasco housing development for the reasons set forth more fully below.

These segments of rights of way run through the Sunnydale/Velasco housing community, which is a low-income public housing community of 775 families and seniors. The 50-acre property suffers from poor infrastructure and substandard housing conditions, which the community has endured for decades. (See page 1 in the attached diagrams.) This housing community is currently undergoing a physical transformation that over the next 10-plus years will result in a completely new street and utility grid, neighborhood community center and retail, and most importantly, new quality affordable housing for the current families as well as additional affordable and market rate housing for a total of 1,700 households. (Please refer to pages 2-4 in the attached diagrams.) This ambitious and important development is being undertaken by a master development team of Mercy Housing and Related California, in collaboration with the City of San Francisco's HOPE SF Initiative to transform socially and



physically neglected and isolated public housing into equitable, thriving healthy communities.

The construction of this master plan will occur in phases to allow for existing residents to remain in the community while the new development is built. (Please see page 5 in the attached diagrams.) Mercy Housing and Related California will construct the new streets and utilities in Santos and Sunnydale Avenues on behalf of the City, which will own and operate them after construction completion. The construction of these Santos and Sunnydale Avenue segments will occur in two to three separate phases: Phases 1A-3, 1B and then 1C (and 1B and 1C may be combined). The construction schedule for the phases will be pending the timing of previous phases, the timing of the relocation of existing households out of the proposed development area into other available housing in the neighborhood, the availability of financing, and the timing of City infrastructure agencies approving the construction permits. It is possible that our construction schedules for the phases could align with that of the PG&E transmission line project, but it is also very likely that they will not align. This would mean that the transmission line project would either be approved for construction in rights of way that will not exist per PG&E's application, or Mercy Housing and Related California construct the new Santos and Sunnydale streets and utilities per our City approved master infrastructure plan, and then PG&E is forced to tear up what has been constructed.

The impact of this latter scenario would mean that:

1. The residents of Sunnydale and Visitation Valley neighbors would experience repeat demolition and construction activity, first from the new development and then by PG&E.
2. The public transit lines on Santos and Sunnydale Avenues, as well as the pedestrian, bicycle and auto traffic, would need to be re-routed to accommodate the PG&E construction, and this could potentially interfere with Mercy/Related's construction period traffic control if we are working on another phase;
3. A neighborhood-wide "Hub" that will be constructed along Santos and Sunnydale Avenues will be impacted by PG&E's construction, including neighborhood retail, youth programs, community center and parks and open spaces

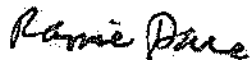
4. PG&E would need to re-construct the new street beds with the bus stops, bike lanes, and chicanes for bioretention and other streetscape features in our master plan.

Potential impacts or environmental effects of a transmission line construction on the Sunnydale community include Aesthetics, Land Use and Planning, Air Quality, Noise, Recreation, and Transportation and Traffic. For the Sunnydale community, the transmission line project will not be the typical temporary inconvenience of utility construction and street closures with life going back to normal. The environmental evaluation must consider the equity of these impacts on a primarily low income, multi-racial community with one of the City's highest population of children and youth.

We support PG&E's application for an overall project to increase capacity and reliability of the electrical infrastructure in this City. We know that Mercy Housing and Related California's portfolio of housing in the City will benefit from this effort. However, we ask that alternatives that avoid construction in the Sunnydale/Velasco housing development be seriously considered and analyzed in the EIR so that the new PG&E transmission line construction does not lead to the negative and harmful impacts described above.

Please contact me at rdare@mercyhousing.org or (415) 355-7118 if you have any questions. Thank you.

Sincerely,



Ramie Dare

Director, Real Estate Development

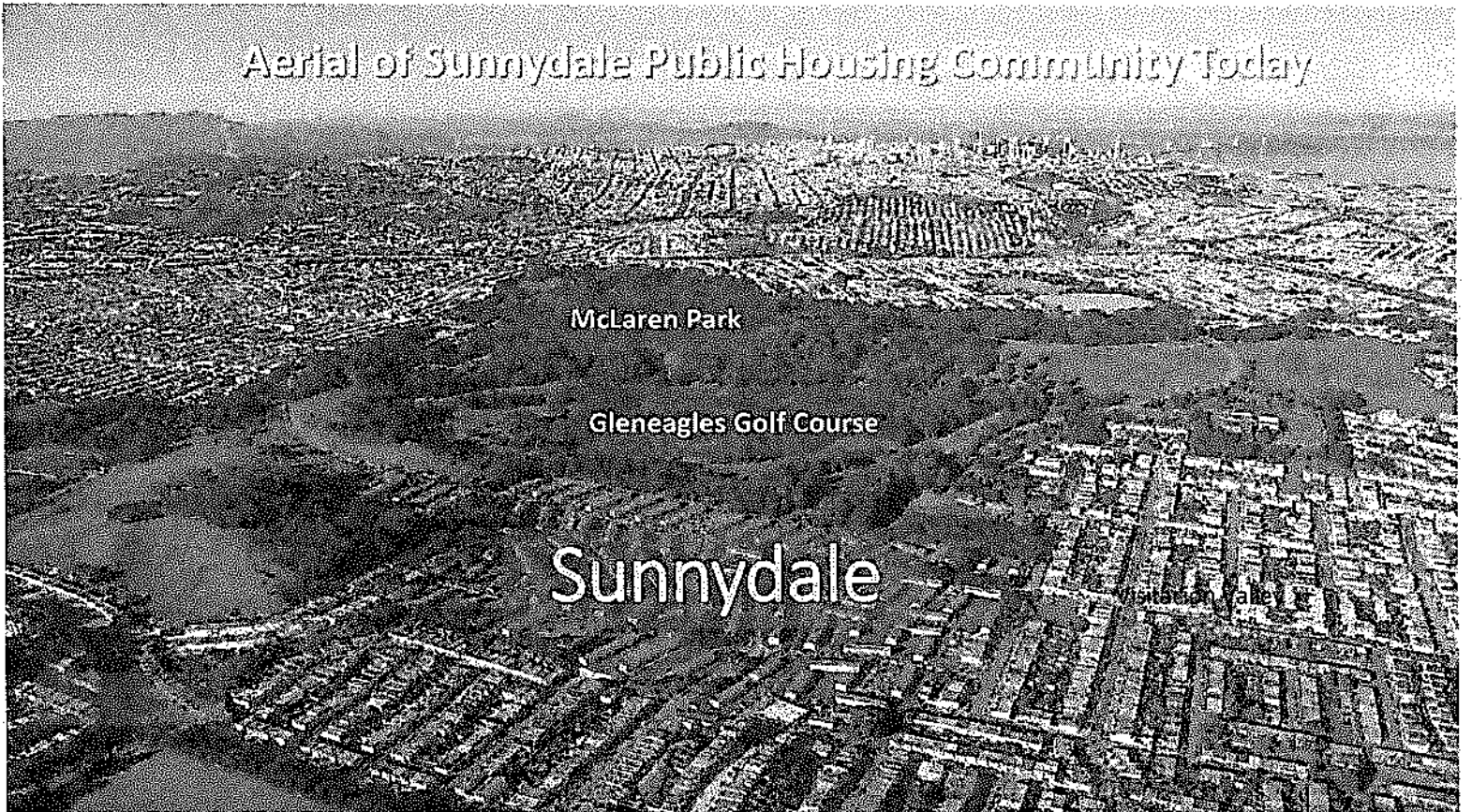
Aerial of Sunnydale Public Housing Community Today

McLaren Park

Gleneagles Golf Course

Sunnydale

Winstanley Lake





SUNNYDALE HOPE SF MASTER PLAN

SAN FRANCISCO, CA | SEPTEMBER 25, 2011 | 1001 MARKET STREET, SUITE 1000 | THE OFFICE OF URBAN DESIGN



What	Today	Sunnydale HOPE SF Master Plan
Affordable Housing units	775 public housing units	969 to 1,006 affordable rental units including units for existing Sunnydale/Velasco households to exercise Right to Return to a new construction unit, plus new affordable units for working families and extremely low income seniors
Market rate units	0	600-694 units
Community facilities on site	29,000 sq ft center with SFHA leasing office, health & wellness center, and after school programs	60,000 sq ft for neighborhood amenities, including retail, two early childhood learning centers, after school programs, family resource center, gym, multi-purpose and educational spaces.
Outdoor recreation on site	Less than ½ acre of playgrounds and basketball court	3.6 acres on four blocks; Linear open space with multi-purpose path on Sunnydale Ave
Public Infrastructure	Curvilinear street pattern; failing utility infrastructure	All new street grid with street trees, green stormwater infrastructure, lighting, transit related infrastructure; all new utilities.



