



COMMITTEE FOR
GREEN FOOTHILLS

August 28, 2003

Billie Blanchard
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-2906

By Fax: (415) 955-4776
and U.S. Mail

**Re: Comments on Draft Environmental Impact Report: Pacific Gas and Electric Company's Proposed Jefferson-Martin 230 kV Transmission Line Project
CPCN Application No. 02-09-043, SCH No. 2003012066**

Dear Ms. Blanchard,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the above-referenced project. I am writing on behalf of Committee for Green Foothills, an environmental organization with over 1300 family members throughout San Mateo and Santa Clara County. We have reviewed the very voluminous DEIR and wish to submit the following comments, which focus primarily on the southern 13-mile segment of the project.

We urge that the Decision of the California Public Utilities Commission on this project be guided by the following important environmental and operational principles:

1. Protect, and where feasible, restore the scenic, recreational, habitat, and environmental values of the San Francisco Watershed lands.
2. Comply with county, state, and federal adopted plans and policies, in particular the SFPUC Watershed Management Plan and the federally-held Scenic and Recreation Easements that cover the 23,000 acres of the Watershed.
3. Ensure maximum reliability for the transmission lines through the Watershed.
4. Provide maximum security from sabotage, vandalism, and terrorism.
5. Protect adjacent communities from exposure to electro-magnetic fields (EMFs).

Support for Watershed Protection Alternative, (modified Alternative 1B with above-ground northern segment): We believe that the alternative that most fully complies with the above stated criteria is Alternative 1B, with modifications as follows:

1. From the Jefferson Substation to the Carolands Substation the existing 60 kV lines should be undergrounded under Canada Road and Skyline Boulevard as part of Alternative 1B. We are informed that in some sections of this segment the north-south 60 kV line may not be necessary (the 230 kV can be stepped down, eliminating the need to bury a separate 60 kV line); where the 60 kV line is still necessary, it could be transitioned to aboveground and extended to connect with the existing taps or substations. At San Mateo Creek, the most

feasible route for crossing the canyon would be to transition to overhead lines for a half mile, as described in the DEIR.

2. From the Carolands Substation to San Bruno, the same undergrounding of both new and existing transmission lines under existing streets is preferable. However, due to the constrictions of the right of way for streets in this area, and the difficulty of avoiding EMF impacts to residents, the Partial Underground Alternative as described in the DEIR (which proposes aboveground right of way through the constricted area) would be acceptable. The DEIR states that the SFPUC Watershed Management Plan prohibits the creation of new utility corridors, and requires that new power lines be buried, where feasible. The potential conflict that is created by an aboveground expanded or new right of way in this segment would be mitigated by the undergrounding of both existing and new transmission facilities throughout the southern segment between Jefferson and Carolands Substations.

Undergrounding of the existing 60 kV lines is appropriate mitigation: PG&E asserts and the DEIR apparently agrees that the applicant cannot be required to underground the existing 60 kV lines as part of the proposed project as there is no connection (nexus) between the existing 60 kV and proposed 230 kV transmission line projects. However, contrary to this assertion, PG&E proposes to reconfigure the existing substations along the way in order to allow the replacement of the existing double-circuit 60 kV line with a single circuit 60 kV line. Thus, there is a future anticipated additional project that is not just contemplated by PG&E, but is being accommodated and prepared for as part of the proposed project. We believe that not only is it required under CEQA to consider the totality of the transmission line project, but if this is done as required, the undergrounding of the existing 60 kV lines is a reasonable mitigation measure that will offset any potential visual impacts from the aboveground section of this project north of Carolands Substation.

The Watershed Protection Alternative would not simply avoid potential significant impacts to the celebrated environmental values of the Watershed and its adjacent residential communities, but it would also restore to a more natural state the areas most impacted by the existing 100 towers and associated transmission lines, while meeting the project's stated objectives.

Additional operational and security benefits from Watershed Protection Alternative: With today's increased vulnerability to vandalism, terrorism, and international sabotage, it is imperative to secure our essential public utilities. At the present time, the existing towers and aboveground transmission lines in the San Francisco Watershed are virtual sitting ducks. The incremental cost of undergrounding is greatly outweighed when considering the benefits of increased security. Additionally, underground systems reduce operational costs, an important life-cycle consideration.

We further note that PG&E proposes to underground the 12-mile segment between San Bruno and the Martin Substation. The southern segment through the watershed has greater environmental values, and is even more deserving of undergrounding than the northern segment through the San Bruno, South San Francisco, Daly City, and Brisbane.

Opposition to proposed aboveground segment of "Partial Underground" Alternative between MP 0.0 and 1.9: The DEIR describes under the Partial Underground Alternative an aboveground


segment that would be constructed as shown in Figure Ap. 1-53. This Alternative is unacceptable due to its location on a new right of way through the "Triangle" area of highly sensitive serpentine grasslands within the San Francisco Watershed just west of Edgewood Natural Preserve and Park. Towers associated with construction in this area could potentially affect several species of rare serpentine-endemic plants and animals.

Need for compliance with National Environmental Policy Act (NEPA): We note that if the selected project involves construction of new higher towers or construction within a new or expanded right of way through the San Francisco Watershed lands, such action will trigger the requirement for approval by the Golden Gate National Recreation Area that holds the federal easements (a Scenic Easement over 19,000 acres, and a Scenic and Recreation Easement over 4,000 acres) of the watershed lands. This federal action will require analysis under NEPA.

Thank you again for the opportunity to comment on the DEIR. Committee for Green Foothills urges the adoption of the amended Watershed Protection Alternative (1B) as described in these comments.

Please continue to keep us informed as to the decision-making process, and thank you for your attention to these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Lennie Roberts".

Lennie Roberts, Legislative Advocate
Committee for Green Foothills