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Pacific Gas and Electric Company

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August 1, 2008

California Department of Transportation
Attn: Yolanda M. Rivas, Branch Chief
District 4 Office of Environmental Analysis
Mail Station 8B
111 Grand Avenue,
Oakland, CA 94612

Re: Caltrans Highway 101 Marin-Sonoma Narrows HOV Widening Project, Draft EIR - PG&E Comments

Dear Ms. Rivas:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the California Department of Transportation (Caltrans) Highway 101 Marin-Sonoma Narrows HOV Widening Project.

PG&E owns and operates gas and electric transmission and distribution facilities located within and adjacent to the proposed project. Some of these facilities are in conflict with this project and will need to be relocated. Our review indicates that PG&E may need to relocate approximately 7.7 miles of electric transmission line and 8.5 miles of high pressure gas transmission line, as specifically described below. Information provided in the DEIR did not specifically indicate the direct impacts on PG&E's gas and electric facilities, nor did it make the determination that there will be no significant unavoidable impacts caused by the proposed relocations.

PG&E has an obligation to provide the public with a reliable and safe energy supply. In order to do so and insure the safe operation and maintenance of utility facilities the California Public Utilities Commission (CPUC) mandates that PG&E comply with guidelines outlined in General Orders 95, 112-E and 131-D.

The CPUC regulates the construction of electric transmission facilities per General Order 131-D. For the relocation of electrical transmission facilities rated 50,000 kilovolts (50 kV) and above and a relocation of this magnitude the CPUC would ordinarily require the processing of a Permit to Construct (PTC), which focuses on California Environmental Quality Act (CEQA) review of potential environmental impact of the project. In this Order, the CPUC specifies that a PTC is <u>not</u> required for:

"Power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (EIR or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation."

The CPUC has set the bar very high when allowing this exemption to a PTC, requiring that the activities associated with the relocation be specifically described and potential impacts addressed in the CEQA document. Since the DEIR does not presently include specific descriptions of our activities, the CPUC would likely require a PTC and conduct its own CEQA review of our relocation activities. This review process could significantly affect our schedule for completing the relocation.

We feel the minimum that the CPUC will need to affirm our use of the PTC exemption for this project is for Caltrans to include specific relocation activity and location information in its CEQA document. To facilitate this inclusion we have provided the following 'typical' gas and electric line relocation activity descriptions:

Gas Transmission Facilities:
For the segment of pipeline to be relocated, PG&E will need to trench along the new alignment separating topsoil from subsoil, string and weld together sections of new pipe, place the new pipe in the trench, hydrotest the new line and then backfill the trench first with the subsoil and finally with the topsoil. Finally the new pipeline will be tied into the existing pipeline at the beginning and end of the relocation. Surface restoration will be provided to return the vegetative cover to preconstruction type and density. The existing pipeline affected by the Caltrans project will either be abandoned in place or removed, depending on whether its present location would be directly affected by the proposed project. Abandonment involves the cleaning of the pipeline, filling it with either an inert gas such as nitrogen or with a concrete slurry, and capping the ends with steel plates. Removal involves trenching along the line to expose it, cutting the pipe into manageable sections and removing them from the trench, then hauling them from the site for disposal or recycling. The trenching, backfill and surface restoration would be similar to the relocation activity described above. A construction working strip approximately 100 feet wide generally centered on the pipeline alignment is required to conduct the above-described work. Equipment used will be backhoes, dump trucks, excavators, crew trucks and welding trucks and approximately 12 to 16 workers.

Electric Transmission Facilities:
PG&E will survey and stake the new pole locations, frame and set the wood poles and then string conductor (wire) on the new line. The existing pole line will need to be de-energized at the beginning and end of the relocation so that the segment of the new pole line may be connected to the existing pole line. If the relocated alignment precludes the use of guy wires, self-supporting tubular steel poles (TSP) may be required for angle points. Depending on the angle, a concrete foundation may be required rather than the direct buried TSP. The old poles will also be removed by cutting them off at ground level and hauling them off site for disposal. A construction work area approximately 80 feet in diameter at each new pole location and each pole to be removed is required to conduct the above described work. Equipment used will be line truck and bucket trucks and approximately 8 to 12 workers. A pole setting excavator will be necessary if PG&E does work in the winter months.

After reviewing the Caltrans Highway 101 Marin-Sonoma Narrows HOV Widening Project maps of Segments A, B and C, contained in Volume 2 of the DEIR dated October 2007 it appears that portions of 3 of PG&E's existing high pressure gas transmission lines (Line 21C, Line 21F and Line 21G) and 1 existing PG&E electric transmission pole line (Lakeville No. 2 60kv Pole Line) are in conflict with the project and will need to be relocated. It also appears that modifications may be needed to 5 existing PG&E 60kV electric transmission pole lines and 1 PG&E 115kV Pole Line which cross Highway 101 at 8 separate locations.

The following are descriptions of where these PG&E gas and electric transmission facilities are located relative to the Caltrans project. We have referenced these descriptions to Proposed Caltrans Highway Stations shown on the Caltrans Segment A, B and C mapping contained in Volume 2 of the DEIR.

Gas Transmission Lines:
Refer to EXHIBIT "G" shs1 thru 5 (attached) for a depiction of the approximate locations of potential Gas Transmission line Relocations.

PG&E's Line 21G, 16 inch diameter high pressure gas transmission line, (relocation).

1-GR Located in the general proximity of and westerly of Proposed Caltrans Highway Station (PCHS) 1374+00 (metric), Line 21G extends in a northerly direction parallel with and westerly of the general westerly boundary line of Highway 101, then crosses Highway 101 near PCHS 1386+00 (metric) and extends in a northerly and northwesterly direction parallel with and easterly of the general easterly boundary line of Highway 101 to a point in the proximity of and easterly of PCHS 1430+00 (metric) for a length of approximately 19,000 feet (3.6 miles), located within Marin County.

PG&E's Line 21F, 12 inch diameter high pressure gas transmission line, (relocation).

2-GR Located in the general proximity of and westerly of PCHS 1380+00 (metric), Line 21F extends in a northerly direction parallel with and westerly of the general westerly boundary line of Highway 101, then crosses Highway 101 near PCHS 1386+00 (metric), and extends in a northerly and northwesterly direction parallel with and easterly of the general easterly boundary line of Highway 101 to a point in the proximity of and easterly of PCHS 1430+00 (metric) for a length of approximately 17,000 feet (3.2 miles), located within Marin County.

PG&E's Line 21F, 12 inch diameter high pressure gas transmission line, (relocation).

3-GR Located in the general proximity of and westerly of PCHS 2020+00 (metric), Line 21F extends in a northerly and northwesterly direction parallel with and easterly of the general easterly boundary line of Highway 101 to a point in the proximity of and easterly of PCHS 2044+00 (metric) for a length of approximately 8,000 feet (1.5 miles), located within Sonoma County. This also includes a tap line entitled DREG 3864 crossing Highway 101 in a westerly direction near PCHS 2030+00.

PG&E's Line 21C, 12 inch diameter high pressure gas transmission line, (relocation).

4-GR Located in the general proximity of and westerly of PCHS 2081+00 (metric), Line 21C crosses Highway 101 at his location and extends a northerly direction parallel with the general easterly boundary line of Highway 101 to a point in the proximity of and easterly

of PCHS 2083+00 (metric) for a length of approximately 1,000 feet (0.2 miles), located within Sonoma County.

Electric Transmission Lines:
Refer to EXHIBIT "E" shs1 thru 8 (attached) for a depiction of the approximate locations of potential Electric Transmission Line Relocation and Electric Transmission Line Crossings that may need to be modified.

PG&E's Lakeville No. 2 60kV Pole Line, (relocation).

1-ER One hundred and thirty two (132) poles on PG&E's Lakeville No. 2 60kV Pole Line may need to be relocated. Beginning at Pole 4/13 located in the proximity of and easterly of PCHS 1369+00 (metric), the pole line extends in a northerly and northwesterly direction parallel with the general easterly boundary line of Highway 101, crossing the Marin County / Sonoma County line near Pole 9/6 at Proposed Highway Equation Station 1440+80 / 2000+00 (metric) the pole line then continues northwesterly and crosses Highway 101 at the span between Poles 9/11 and 9/12 near PCHS 2007+00 (metric) and then extends in a northerly and northwesterly direction parallel with the general westerly boundary line of Highway 101 and then crosses Highway 101 at the span between Poles 11/17 and 11/18 near PCHS 2041+00 (metric) and then extends in a northwesterly direction parallel with the general easterly boundary of Highway 101 to Pole 12/6 located in the proximity of and easterly of PCHS 2050+00 (metric) for a length of approximately 24,000 feet (4.5 miles) located within Marin County and 17,000 feet (3.2 miles) located within Sonoma County.

Modification of 5 PG&E 60 kV electric transmission pole lines and 1 PG&E 115kV electric transmission pole line crossing Highway 101:

1-EC / 2-EC Two (2) towers (0/2 and 0/3) on PG&E's Ignacio-San Rafael 115kV Pole Line and PG&E's Ignacio-Alto 60kv circuit, spanning Highway 101 in the proximity of PCHS 300+50 (metric), located in Marin County (note: towers built for highway crossing).

3-EC Two (2) poles (0/2 and 0/3) on PG&E's Ignacio-Bolinas No. 1 60kV Pole Line spanning Highway 101 in the proximity of PCHS 301+00 (metric), located in Marin County.

4-EC Two (2) poles (0/1 and 0/2) on PG&E's Ignacio-Bolinas No. 2 60kV Pole Line spanning Highway 101 in the proximity of PCHS 301+00 (metric), located in Marin County.

5-EC Two (2) poles (2/35 and 2/36) on PG&E's Ignacio-Alto 60kV Pole Line spanning Highway 101 in the proximity of PCHS 337+00 (metric), located in Marin County.

6-EC Two (2) poles (4/0 and 4/1) on PG&E's Lakeville No. 2 60kV Pole Line spanning Highway 101 in the proximity of PCHS 359+00 (metric), located within Marin County.

7-EC Two (2) poles (13/7 and 13/8) on PG&E's Lakeville No. 2 60kV Pole Line spanning Highway 101 in the proximity of PCHS 2063+00 (metric), located within Sonoma County.

8-EC Two (2) poles (4/6 and 4/7) on PG&E's Lakeville-Petaluma C 60kV Pole Line, spanning Highway 101 in the proximity of PCHS 2081+00 (metric), located within Sonoma County.

Gas and Electric Distribution Lines:
There are also PG&E gas and electric distribution facilities which are located within and adjacent to the proposed project and may impact the project. However, the exact impact of the distribution lines upon the project is not known at this time.

We encourage Caltrans to include information about the issue of electric and magnetic fields (EMF) in the Final Environmental Impact Report (FEIR). It is PG&E's policy to share information and educate people about the issue of EMF.

EMFs are invisible fields of force created by electric voltage (electric fields) and by electric current (magnetic fields). Wherever there is a flow of electricity, both electric and magnetic fields are created; in appliances, homes, schools and offices, and in power lines. There is no scientific consensus on the actual health effects of EMF exposure, but it is an issue of public concern. PG&E relies on organizations and health agencies such as the California Department of Health Services, U.S. Environmental Protection Agency and the Electric Power Research Institute to review research on EMF and provide a foundation for developing policies.

Because there is concern about the possible health effects of exposure to EMF, we support and fund medical, scientific, and industry research on EMF. It is PG&E policy to consider EMF in the design, planning and construction of new and upgraded facilities.

Please continue to consult PG&E during the development of the project to ensure that the capacity, operational and maintenance requirements for PG&E's gas and electric facilities are taken into consideration prior to approval of the FEIR. Based on the above activity location descriptions, we trust Caltrans can still make the determination that there will be no significant unavoidable impacts caused by the proposed relocations, and state so in its FEIR.

Please feel free to contact me at (415) 973-5054 if you have any questions. We would also like to request that Chloe Lukins of the CPUC be copied on future correspondence regarding this project and placed on the list to review the FEIR. Her address is provided below.

Sincerely,

Paul Marotto
Land Planner, Land Planning and Routing
Land Energy Delivery
Technical & Land Services
Pacific Gas & Electric Company

c: California Public Utilities Commission
Chloe Lukins, Program and Project Supervisor
Transmission and Environmental Permitting Section
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Jo Lynn Lambert, Attorney, PG&E
Rob Stiving, Land Planning and Routing Supervisor, PG&E
Jim Dunlap, Land Agent, PG&E
Brad Harris, Land Agent, PG&E

Exhibit E Map 1
1-ER
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
101
LAKEVILLE #2
AIRPORT RD
REDWOOD BLVD
AIRPORT RD
Novato
BINFORD RD
101
NUNES DR
COBBLESTONE CT
WOOD HOLLOW DR
FIELDSTONE DR
BRIDLE PATH LN
4/13
Begin 1-ER

Exhibit E Map 2
1-ER
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
101
LAKEVILLE #2
101

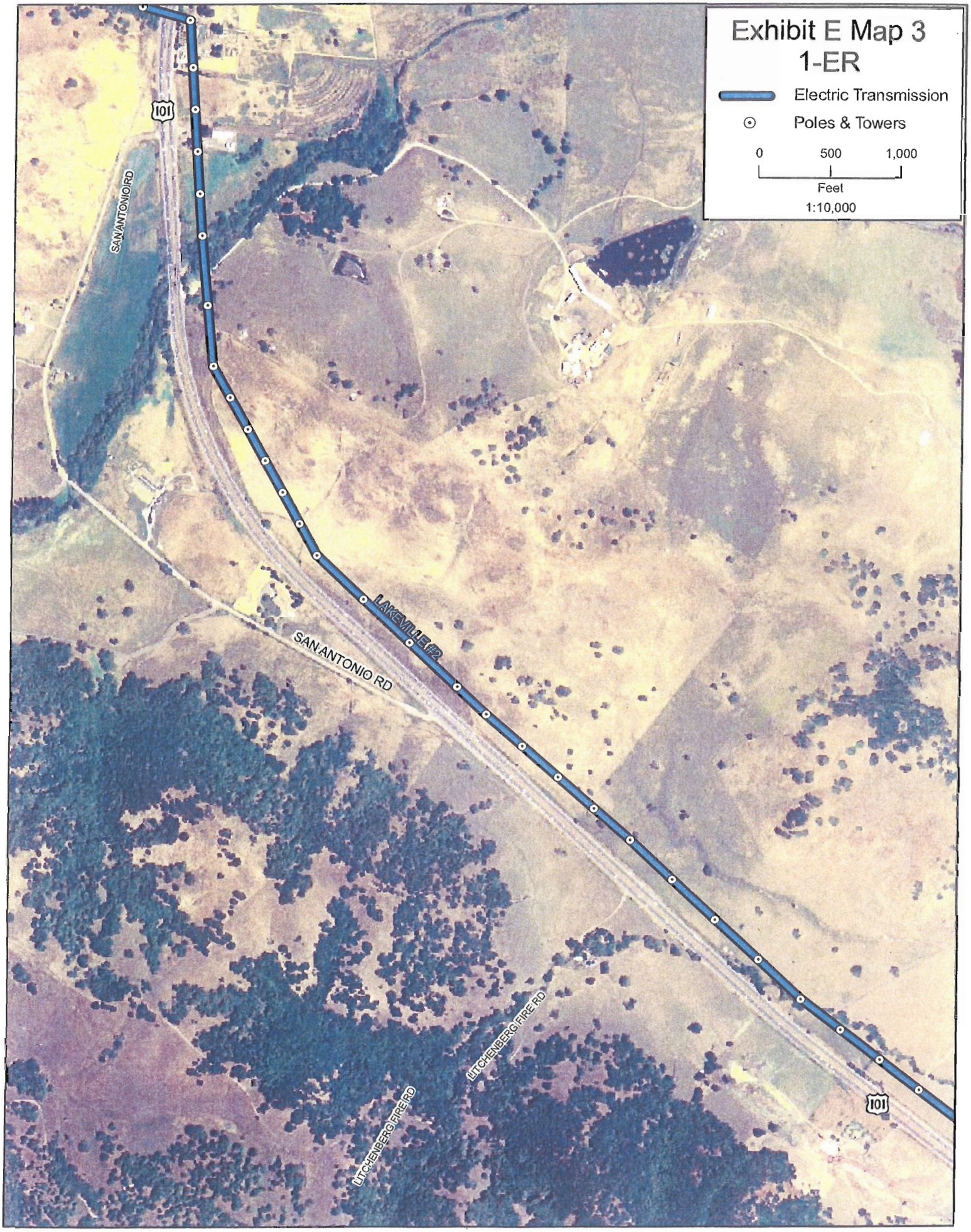
Exhibit E Map 3
1-ER
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
101
SAN ANTONIO RD
LAKEVILLE #2
SAN ANTONIO RD
LITCHENBERG FIRE RD
LITCHENBERG FIRE RD
101

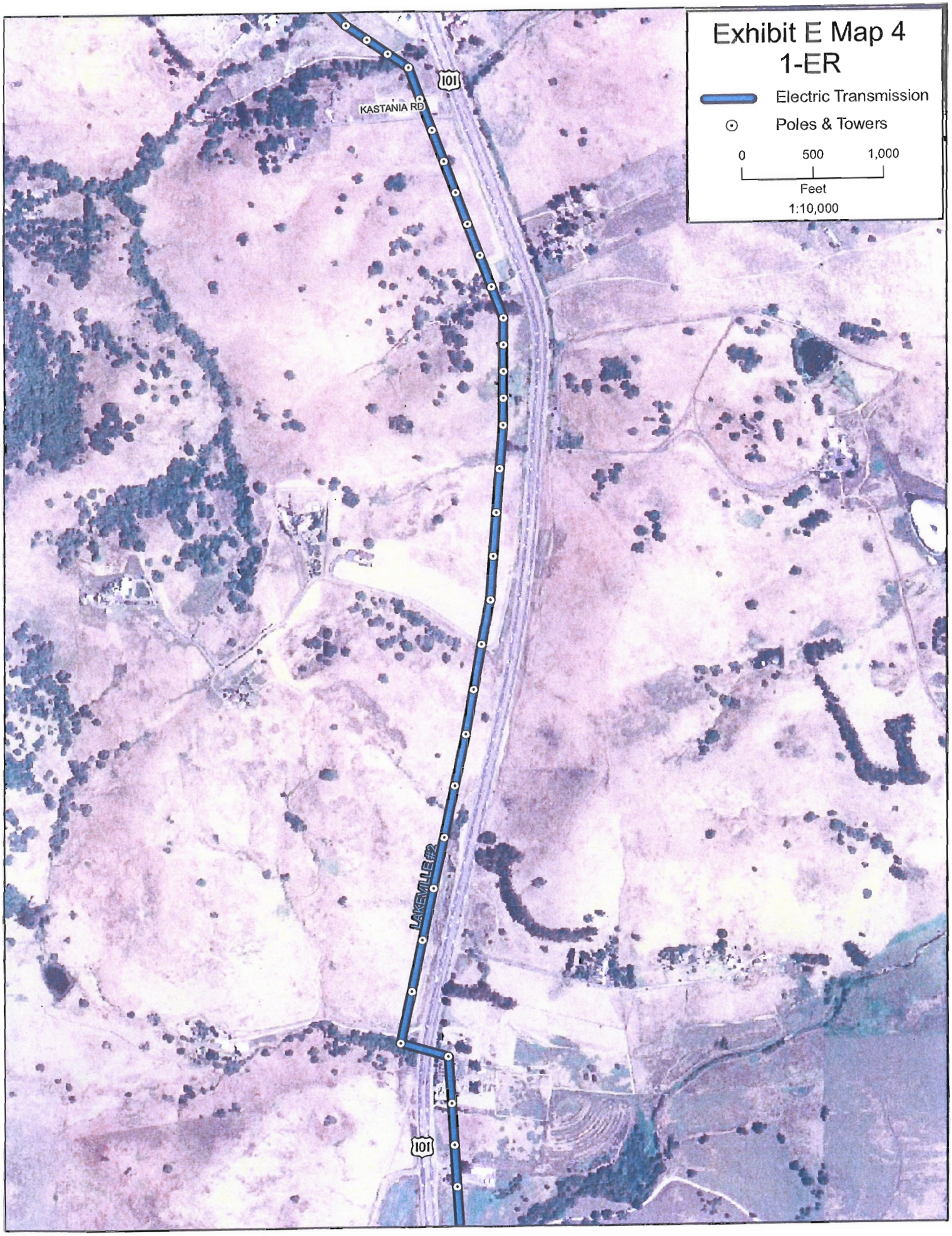
Exhibit E Map 4
1-ER
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
101
KASTANIA RD
LAKEVILLE #2
101

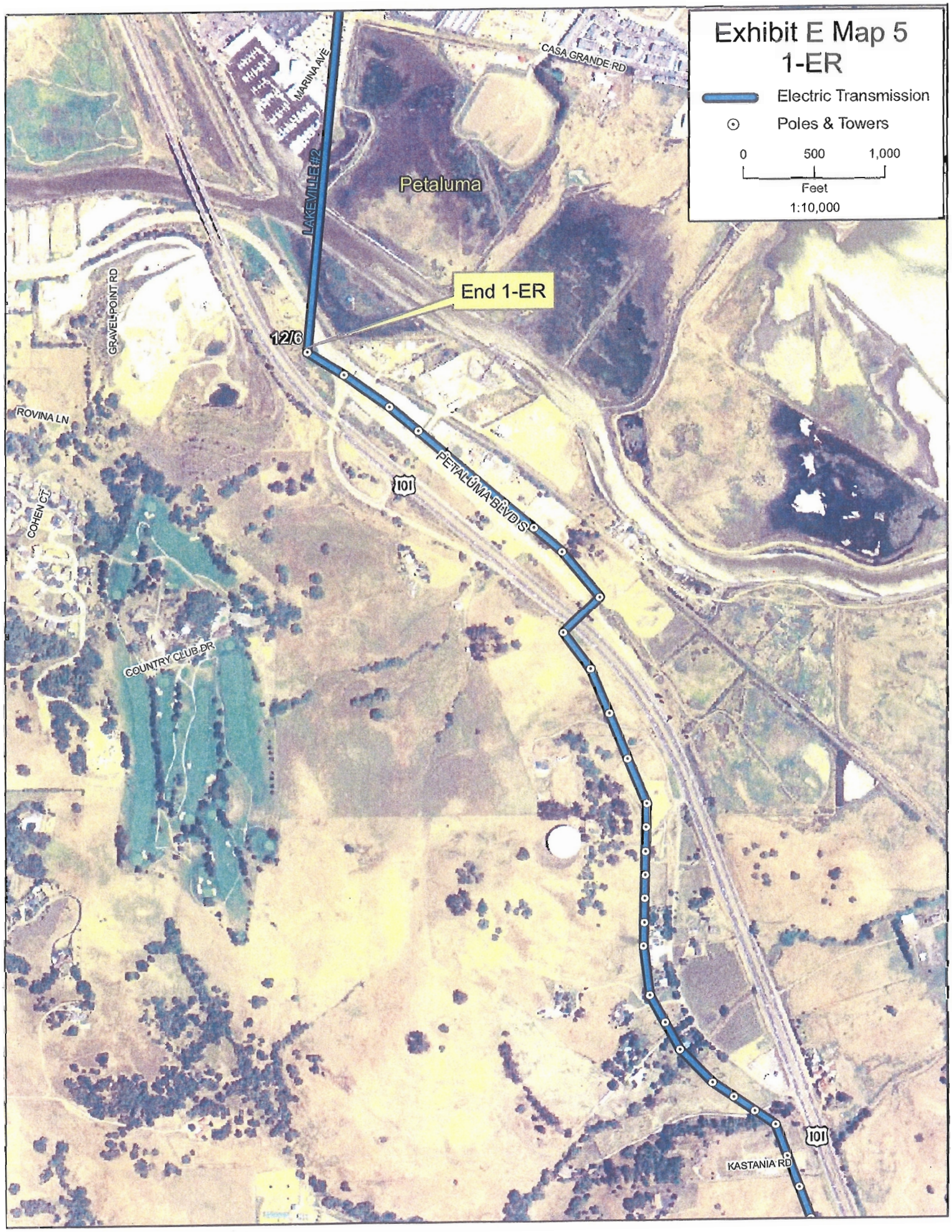
Exhibit E Map 5
1-ER
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
CASA GRANDE RD
MARINA AVE
LAKEVILLE #2
Petaluma
End 1-ER
12/6
GRAVEL POINT RD
ROVINA LN
COHEN CT
PETALUMA BLVD S
101
COUNTRY CLUB DR
KASTANIA RD
101

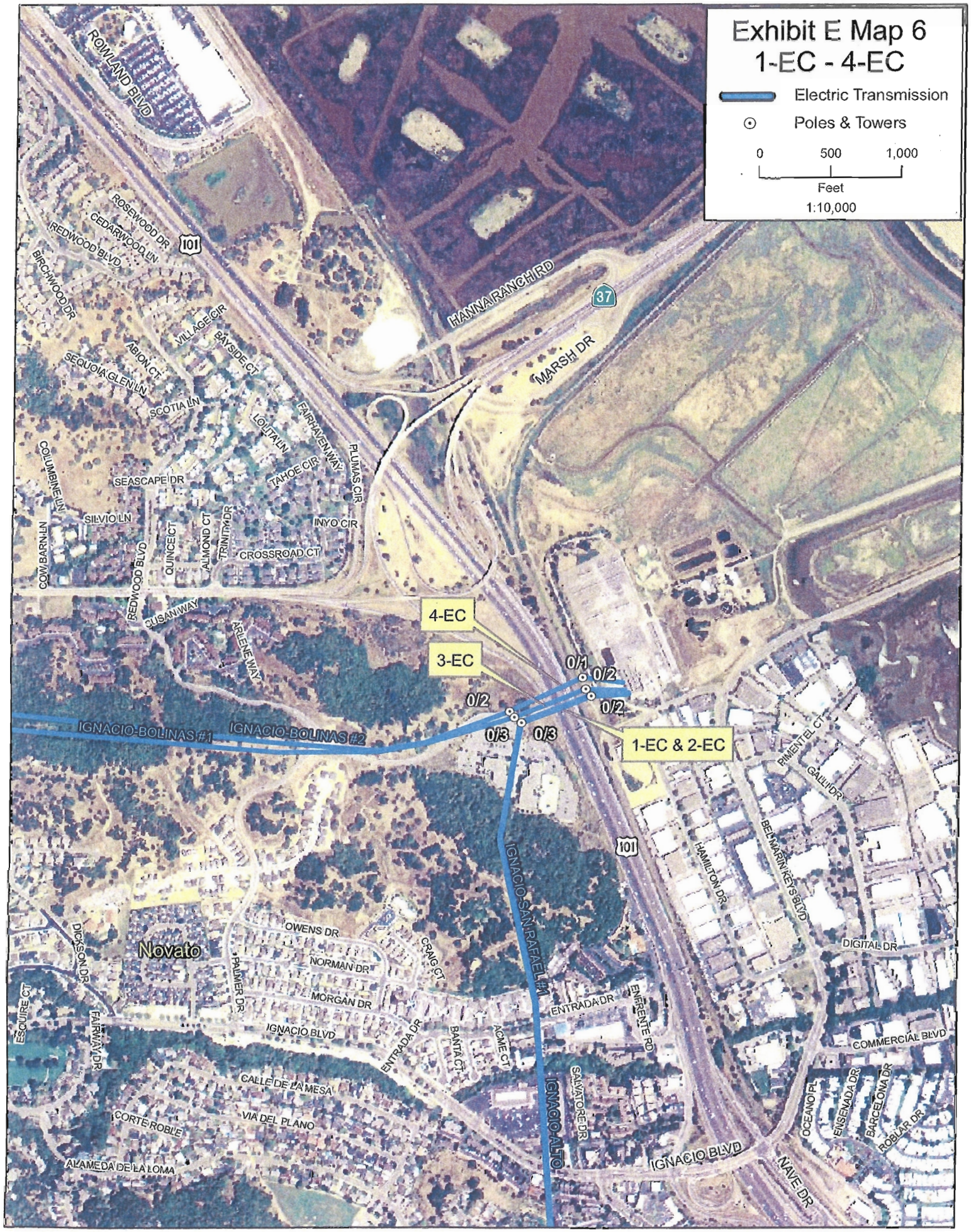
Exhibit E Map 6
1-EC - 4-EC
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
4-EC
3-EC
1-EC & 2-EC
0/1
0/2
0/2
0/2
0/3
0/3
IGNACIO-BOLINAS #1
IGNACIO-BOLINAS #2
IGNACIO-SAN RAFAEL #1
IGNACIO-ALTO
Novato
ROWLAND BLVD
HANNA RANCH RD
MARSH DR
101
37
ROSEWOOD DR
CEDARWOOD LN
REDWOOD BLVD
BIRCHWOOD DR
VILLAGE CIR
BAYSIDE CT
ABION CT
SEQUOIA GLEN LN
SCOTIA LN
LOLITA LN
FAIRHAVEN WAY
PLUMAS CIR
TAHOE CIR
COLUMBINE LN
SEASCAPE DR
SILVIO LN
INYO CIR
COW BARN LN
QUINCE CT
ALMOND CT
TRINITY DR
CROSSROAD CT
REDWOOD BLVD
SUSAN WAY
ARLENE WAY
PIMENTEL CT
GALLI DR
HAMILTON DR
BEL MARIN KEYS BLVD
DIGITAL DR
COMMERCIAL BLVD
OCEANO PL
ENSENADA DR
BARCELONA DR
ROBLAR DR
NAVE DR
IGNACIO BLVD
SALVATORE DR
ENTRADA DR
ENFRENTE RD
ACME CT
BANTA CT
ENTRADA DR
CRAIG CT
OWENS DR
NORMAN DR
MORGAN DR
PALMER DR
IGNACIO BLVD
DICKSON DR
ESCUIRE CT
FAIRWAY DR
CALLE DE LA MESA
VIA DEL PLANO
CORTE ROBLE
ALAMEDA DE LA LOMA

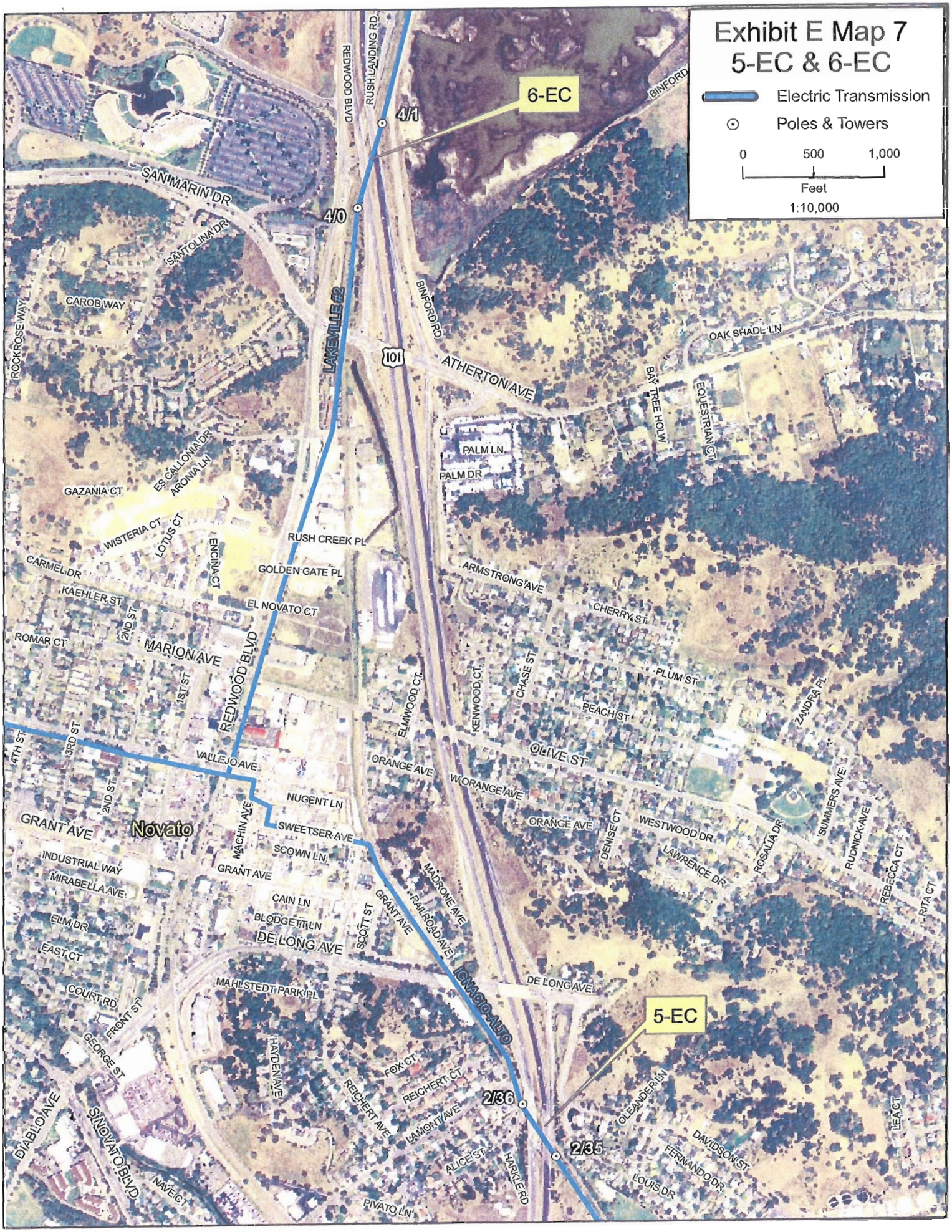
Exhibit E Map 7
5-EC & 6-EC
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
6-EC
5-EC
4/1
4/0
2/36
2/35
REDWOOD BLVD
RUSH LANDING RD
BINFORD
SAN MARIN DR
SANTOLINA DR
CAROB WAY
ROCKROSE WAY
LAKEVILLE #2
BINFORD RD
101
ATHERTON AVE
OAK SHADE LN
BAY TREE HOLW
EQUESTRIAN CT
PALM LN
PALM DR
ES CALLONIA DR
ARONIA LN
GAZANIA CT
WISTERIA CT
LOTUS CT
ENCINA CT
RUSH CREEK PL
CARMEL DR
GOLDEN GATE PL
KAEHLER ST
EL NOVATO CT
ARMSTRONG AVE
CHERRY ST
ROMAR CT
2ND ST
MARION AVE
1ST ST
REDWOOD BLVD
ELMWOOD CT
KENWOOD CT
CHASE ST
PLUM ST
PEACH ST
ZANDRA PL
4TH ST
3RD ST
VALLEJO AVE
ORANGE AVE
OLIVE ST
W ORANGE AVE
NUGENT LN
2ND ST
GRANT AVE
Novato
MACHIN AVE
SWEETSER AVE
SCOWN LN
ORANGE AVE
DENISE CT
WESTWOOD DR
LAWRENCE DR
ROSALIA DR
SUMMERS AVE
RUDNICK AVE
REBECCA CT
RITA CT
INDUSTRIAL WAY
MIRABELLA AVE
GRANT AVE
CAIN LN
MADRONE AVE
RAILROAD AVE
ELM DR
BLODGETT LN
SCOTT ST
GRANT AVE
DE LONG AVE
EAST CT
IGNACIO ALTO
DE LONG AVE
COURT RD
MAHLSTEDT PARK PL
FRONT ST
GEORGE ST
HAYDEN AVE
FOX CT
REICHERT CT
REICHERT AVE
LAMONT AVE
OLEANDER LN
DIABLO AVE
SNOVATO BLVD
ALICE ST
HARKLE RD
DAVIDSON ST
FERNANDO DR
LEA CT
NAVE CT
LOUIS DR
RIVATO LN

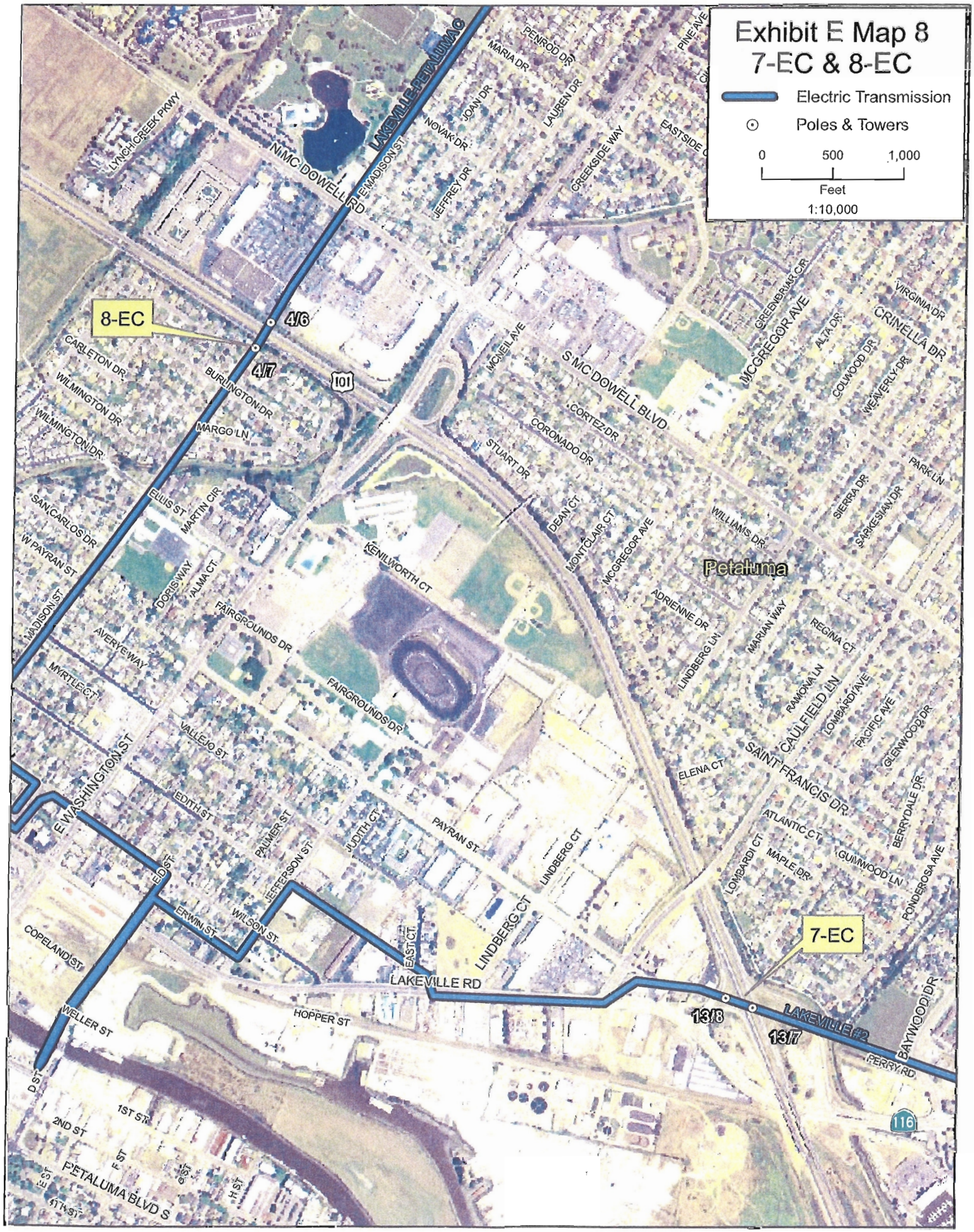
Exhibit E Map 8
7-EC & 8-EC
Electric Transmission
Poles & Towers
0
500
1,000
Feet
1:10,000
8-EC
7-EC
4/6
4/7
13/8
13/7
LAKEVILLE-PETALUMA
LAKEVILLE #2
N MC DOWELL RD
S MC DOWELL BLVD
MCGREGOR AVE
E WASHINGTON ST
LAKEVILLE RD
PETALUMA BLVD S
Petaluma
101
116
LYNCH CREEK PKWY
CARLETON DR
WILMINGTON DR
BURLINGTON DR
MARGO LN
ELLIS ST
MARTIN CIR
SAN CARLOS DR
W PAYRAN ST
MADISON ST
DORIS WAY
ALMA CT
AVERYE WAY
MYRTLE CT
FAIRGROUNDS DR
KENILWORTH CT
VALLEJO ST
EDITH ST
PALMER ST
JEFFERSON ST
JUDITH CT
PAYRAN ST
LINDBERG CT
EAST CT
ERWIN ST
WILSON ST
COPELAND ST
WELLER ST
HOPPER ST
D ST
1ST ST
2ND ST
E ST
F ST
G ST
H ST
4TH ST
PENROD DR
MARIA DR
JOAN DR
LAUREN DR
NOVAK DR
JEFFREY DR
CREEKSIDE WAY
EASTSIDE
MCNEIL AVE
CORTEZ DR
CORONADO DR
STUART DR
DEAN CT
MONTCLAIR CT
GREENBRIAR CIR
ALTA DR
COLWOOD DR
WEAVERLY DR
VIRGINIA DR
CRINELLA DR
PARK LN
SIERRA DR
SARKESIAN DR
WILLIAMS DR
ADRIENNE DR
MARIAN WAY
REGINA CT
LINDBERG LN
RAMONA LN
LOMBARDI AVE
PACIFIC AVE
GLENWOOD DR
CAULFIELD LN
SAINT FRANCIS DR
ELENA CT
ATLANTIC CT
BERRYDALE DR
LOMBARDI CT
MAPLE DR
GUMWOOD LN
PONDEROSA AVE
BAYWOOD DR
PERRY RD

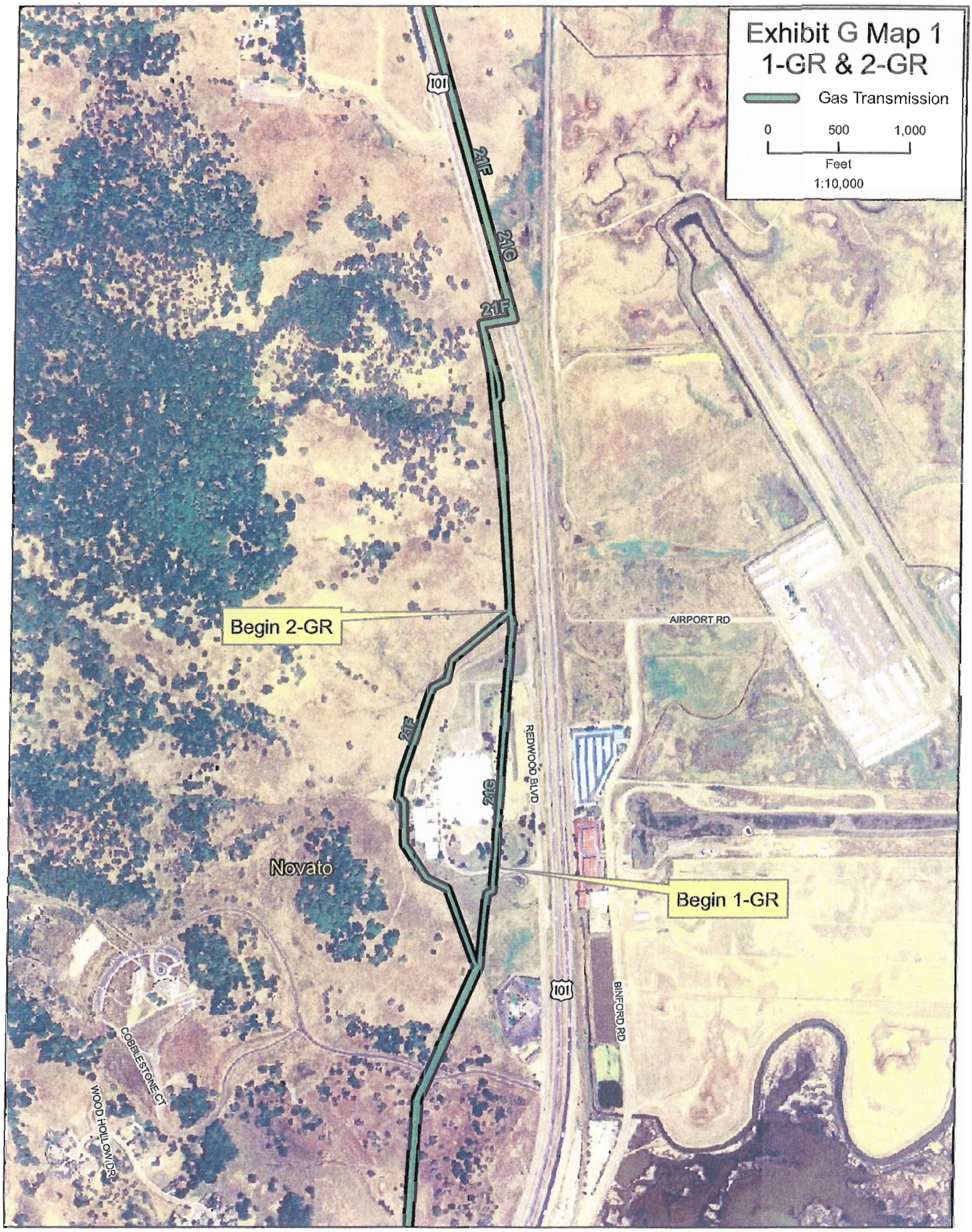
Exhibit G Map 1
1-GR & 2-GR
Gas Transmission
0
500
1,000
Feet
1:10,000
101
21F
21G
21F
Begin 2-GR
AIRPORT RD
21F
21G
REDWOOD BLVD
Novato
Begin 1-GR
101
BINFORD RD
COBBLESTONE CT
WOOD HOLLOW DR

Exhibit G Map 2
1-GR & 2-GR
Gas Transmission
0
500
1,000
Feet
1:10,000
101
21G
21F
21G
101

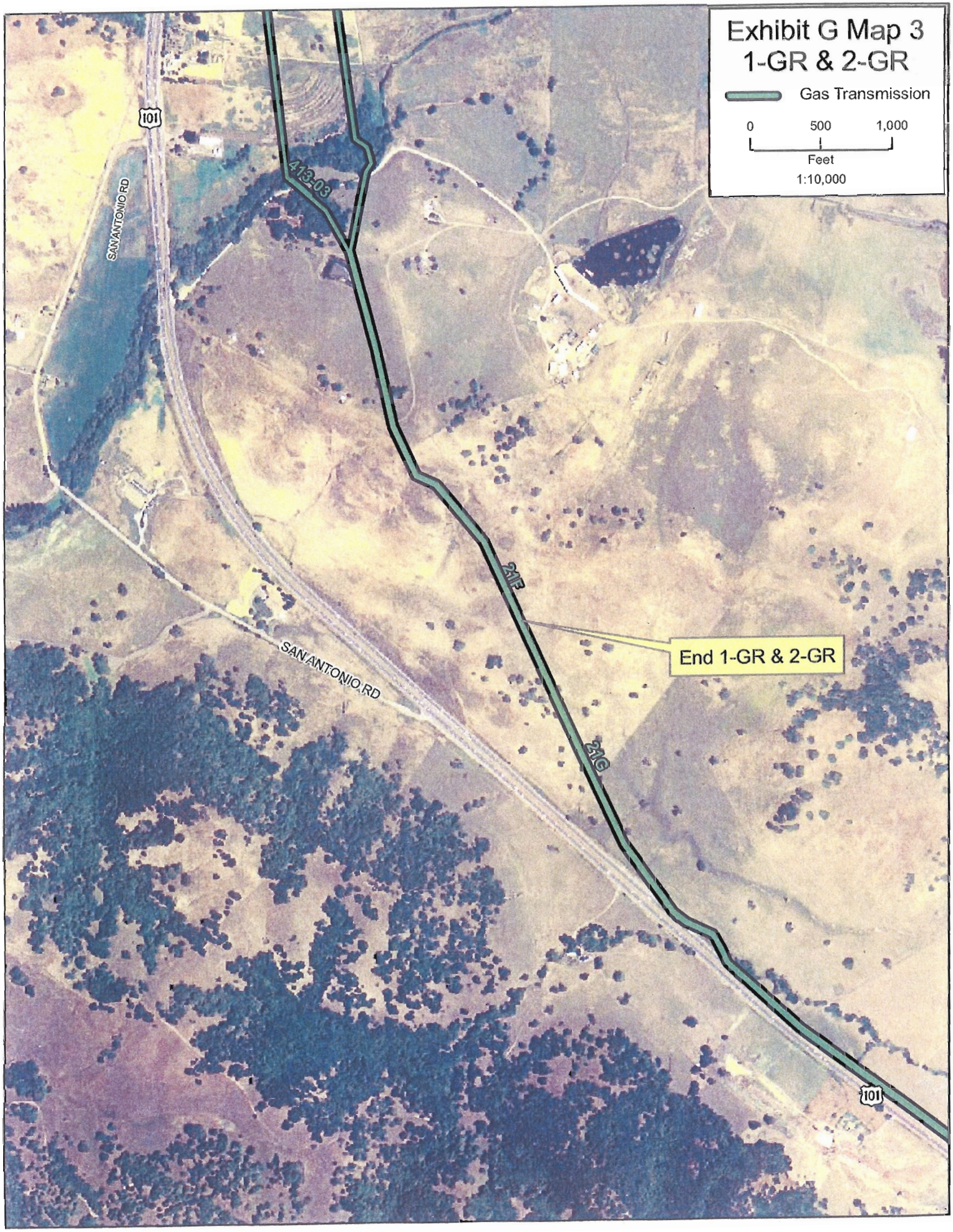
Exhibit G Map 3
1-GR & 2-GR
Gas Transmission
0
500
1,000
Feet
1:10,000
101
SAN ANTONIO RD
413-03
21F
21G
End 1-GR & 2-GR
SAN ANTONIO RD
101

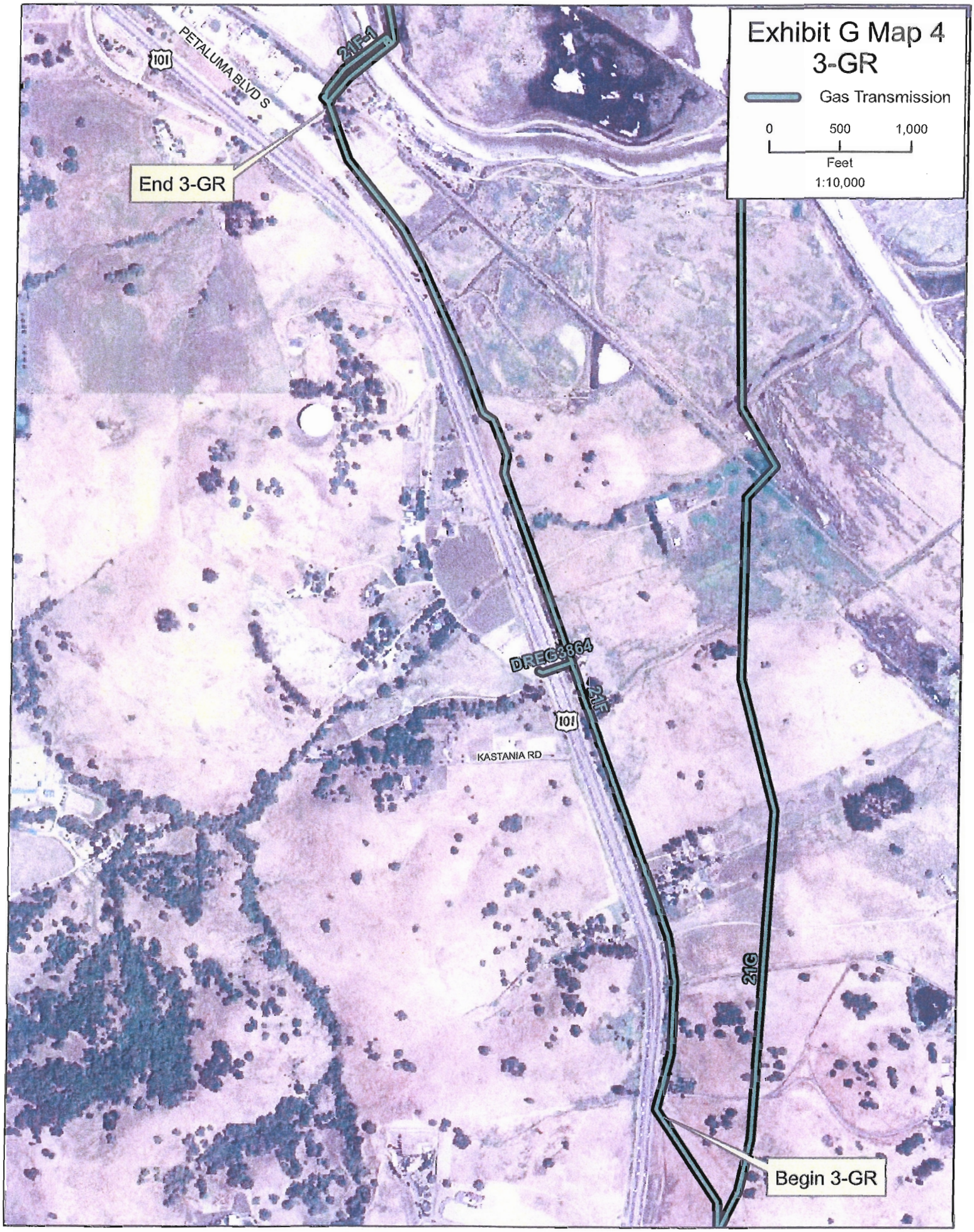
Exhibit G Map 4
3-GR
Gas Transmission
0
500
1,000
Feet
1:10,000
PETALUMA BLVD S
101
21F-1
End 3-GR
DREG&864
21F
101
KASTANIA RD
21G
Begin 3-GR

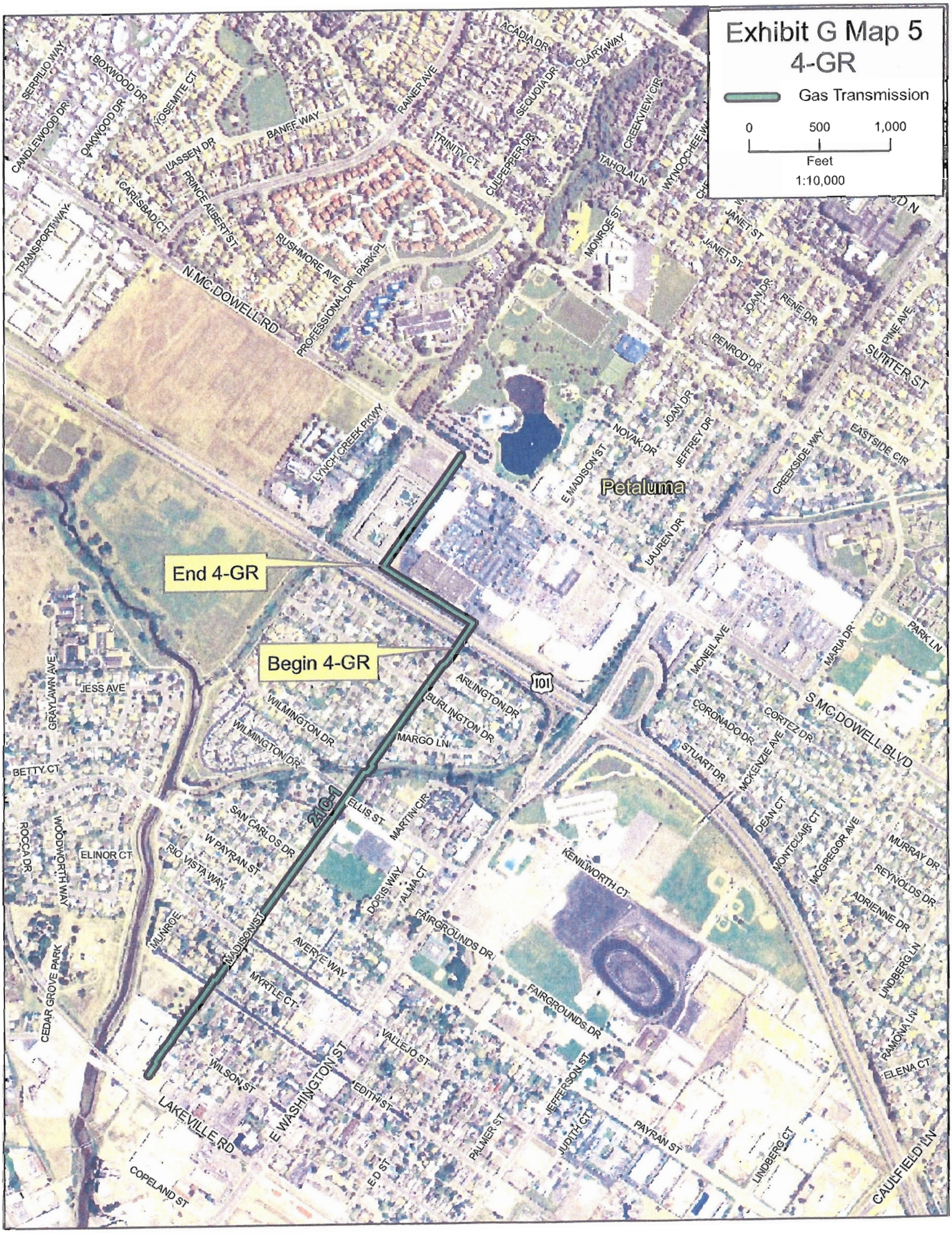
Exhibit G Map 5
4-GR
Gas Transmission
0
500
1,000
Feet
1:10,000
End 4-GR
Begin 4-GR
Petaluma
N MC DOWELL RD
S MC DOWELL BLVD
E WASHINGTON ST
LAKEVILLE RD
MADISON ST
101
SERPILIO WAY
BOXWOOD DR
CANDLEWOOD DR
OAKWOOD DR
YOSEMITE CT
BANFF WAY
LASSEN DR
PRINCE ALBERT ST
CARLSBAD CT
TRANSPORT WAY
RUSHMORE AVE
PARK PL
PROFESSIONAL DR
RAINER AVE
TRINITY CT
ACADIA DR
SEQUOIA DR
CLARY WAY
CULPEPPER DR
CREEKVIEW CIR
TAHOLA LN
WYNOOCHEE WAY
MONROE ST
JANET ST
JOAN DR
RENE DR
PENROD DR
PINE AVE
SUTTER ST
LYNCH CREEK PKWY
NOVAK DR
JEFFREY DR
EAST SIDE CIR
CREEKSIDE WAY
E MADISON ST
LAUREN DR
MCNEIL AVE
MARIA DR
PARK LN
CORONADO DR
CORTEZ DR
STUART DR
MCKENZIE AVE
DEAN CT
MONTCLAIR CT
MCGREGOR AVE
MURRAY DR
REYNOLDS DR
ADRIENNE DR
LINDBERG LN
RAMONA LN
ELENA CT
CAULFIELD LN
ARLINGTON DR
BURLINGTON DR
WILMINGTON DR
MARGO LN
JESS AVE
GRAYLAWN AVE
BETTY CT
WOODWORTH WAY
ROCCA DR
ELINOR CT
CEDAR GROVE PARK
SAN CARLOS DR
W PAYRAN ST
RIO VISTA WAY
ELLIS ST
MARTIN CIR
DORIS WAY
ALMA CT
KENILWORTH CT
FAIRGROUNDS DR
AVERYE WAY
MYRTLE CT
MUNROE
VALLEJO ST
WILSON ST
EDITH ST
JEFFERSON ST
PALMER ST
JUDITH CT
PAYRAN ST
LINDBERG CT
ED ST
COPELAND ST