CHAPTER III
TEXT CHANGES TO THE DRAFT MND

The following text changes are made to the Draft Mitigated Negative Declaration (MND). The changes are shown by page number in the Draft MND and identified as to the location of the change in the body of the text or table.

Where changes are shown inserted in the existing Draft MND text, revised or new language is underlined, deleted language is indicated by ~~strike through~~, and the original text is shown without underline or strike through.

Where not ambiguous, new or replacement text is shown without markings. If the text change is a result of a comment letter received during the public review period on the Draft MND, it is indicated with the text change item. These text changes also appear in Chapter II of this Response to Comments document. If the text change is editorial or a result of document clarification, and not official comment, text changes are shown only.

Page ***Identification*** **/ Text Change:**

1.4 *The first complete paragraph has been revised as follows:*

The San Francisco Stakeholders Group evaluated a variety of potential solutions to address these deficiencies. Their evaluation focused on generation and transmission, dismissing load reduction as an effective long-term solution due to the magnitude of load reduction that would be required to address the deficiencies in the system. Although the San Francisco Stakeholders Group did not evaluate specific generation projects, they did note the need for an additional 400 MW or more of new generation to meet projected power needs for 2009. ~~were not evaluated in the study, the San Francisco Public Utilities Commission included generation additions to PG&E's system as a long-term initiative to meet growing power needs and to increase reliability (SFPUC, 2002) which include the City and County of San Francisco's plans to install three 48 MW LM6000 combustion turbines at the Potrero Substation and one at the San Francisco International Airport.~~ The preferred transmission project was determined to be the Jefferson-Martin 230 kV line, which would bring power to the city, in combination with the internal transmission network reinforcement including construction of a 115 kV underground cable between Potrero and Hunters Point to provide reliability within the city. In December 2000, CAISO formally approved the PG&E's Potrero to Hunters Point 115 kV Cable Project.[1]

[1] The CAISO reiterated its belief that the proposed project was necessary in its April 18, 2003 letter from Terry Winters to Kevin Dasso of PG&E and San Francisco City Attorney Therese Mueller, and its July 4, 2004 letter from Jim Delmers to San Francisco Mayor Gavin Newsom, et. al.

Focusing on these generation needs, the San Francisco Public Utilities Commission, included additions to PG&E's system as a long-term initiative to meet growing power needs and to increase reliability (SFPUC, 2002) which include the City and County of San Francisco's plans to install three 48 MW LM6000 combustion turbines at the Potrero Power Plant and one at the San Francisco International Airport.

1.7 *The last sentence of the 1st bulleted item has been revised as follows:*

- Excavated Materials Storage and Staging Areas. Across the street from the Potrero Switchyard on the northeast corner of Illinois Street and 22nd Street, PG&E's general construction yard provides storage for vehicles and other types of equipment. This yard would be used as a staging area and storage site for materials removed, as well as those used (i.e. concrete, plastic conduit, and asphalt) during the construction phase. This yard is primarily cleared and graded with gravel. If an alternative storage and/or staging area is chosen for use during construction, the site would be surveyed by a biologist prior to construction to verify that no sensitive resources are present.

1.7 *Section 1.4, last portion of the 1st paragraph has been revised as follows:*

Currently, a Static Volt-Ampere-Reactive (VAR) Compensator is being constructed, with operation scheduled for December ~~2005~~2004, at the Potrero Substation to replace the Hunters Point Unit #2 and #3 synchronous condensers. The Static VAR Compensator will allow continuous control of power swings under various ~~system conditions, since the transmitted load varies considerably from one hour to another. Due to their long years of service, these plants have recently begun to exhibit an increased trend of unreliability, with more forced outages, longer duration outages, and maintenance needs increasing in cost and scope. These power plants are also facing additional limitations and/or maintenance costs due to increasingly restrictive air quality regulations.~~ system conditions, since the transmitted load varies considerably from one hour to another. Due to their long years of service, these plants have recently begun to exhibit an increased trend of unreliability, with more forced outages, longer duration outages, and maintenance needs increasing in cost and scope. These power plants are also facing additional limitations and/or maintenance costs due to increasingly restrictive air quality regulations.

1.15 Last sentence in Section 1.8, Step 1 – Trenching/Duct Bank Installation has been revised as follows:

Prior to trenching, PG&E would notify other utility companies (via the Underground Service Alert) to locate and mark existing underground structures along the proposed cable line route, and also would conduct exploratory excavations (potholing) to approve the locations for proposed facilities. PG&E would apply for an excavation permit from the city for trenching in City streets. No roads would be completely closed, although one-way traffic controls would be implemented. PG&E would also coordinate with the Port of San Francisco for the section of Illinois Street, 23rd

Street, Tennessee Street and Evans Avenue within which the Port retains an underlying fee interest. ~~that falls within their jurisdiction between 22nd and 23rd Streets.~~

1.16 *The last portion of the 4th paragraph has been revised as follows:*

Fiber optic lines that PG&E asserts would be for system protection and communication would be housed in two 4-inch-diameter conduits that would be installed above the top level of the 6-inch-diameter conduits or along side of the 6-inch-diameter conduits depending on the trench configuration and within the thermal backfill. The three electrical cables that make up one circuit would be capable of carrying 200 MVA at the normal conductor temperature rating of 90 degrees centigrade. The 200 MVA load on this circuit would be met using copper conductor extruded dielectric cable.

1.17 *The last paragraph on the page has been removed:*

~~***Step 3 – Cable Pulling, Splicing and Termination***~~

~~After installation of the conduit, PG&E would install cables in the duct banks. Each cable segment would be pulled into the duct bank, spliced at each of the vaults along the route, and terminated at the switchyards. The three electric cables and one communication cable would be pulled through individual ducts at the rate of two of the three segments between vaults per day. To pull the cable through the duct bank, a cable reel is placed at the end of a section and a pulling~~

1.23 *The 3rd paragraph has been revised on:*

At the Potrero Switchyard, the bus connection would be attached to an existing bay (Bay ~~18~~17). The transition structure and breaker would be installed within the switchyard toward the southeastern side of the station behind Bay ~~18~~17.

1.25-1.26 *As indicated in Chapter II and in response to comment E1-3,E1-4 and E1-5 (Best, Best and Krieger, LLP) a revision was made in Table 1-2. The Air Quality Mitigation Measure AQ-2 has been revised as follows:*

The following Mitigation Measure was added:

- Construction project that will disturb less than one acre of asbestos containing material, as defined by California Code of Regulation, Title 17, Section 93000, shall comply with all applicable BAAQMD regulatory requirements

*The 4th, 5th, and 7th Mitigation Measures for **AQ-2** now read:*

- Construction projects that will disturb more than one acre of asbestos containing material, as defined by the California Code of Regulations, Title 17, Section 93000, shall prepare and obtain BAAQMD ~~district~~ approval for an asbestos dust mitigation plan. The plan shall specify how the operation will minimize emissions and must address specific emission sources.

- Removal of any asbestos containing materials shall be performed by a CAL-OSHA certified, licensed asbestos abatement contractor in accordance with California Code of Regulations, Title 8, Section 1529.

- All handling and disposal of ~~toxic~~ hazardous materials and waste shall be done in compliance with applicable regulatory requirements including, but not limited to, those administered by U.S. EPA, BAAQMD, Department of Toxic Substances Control (DTSC), San Francisco RWQCB, and Cal-OSHA. ~~performed by a certified solid waste facility.~~

In addition, the following Mitigation Measure in AQ-1 was revised:

- Additionally, Mitigation Measure HAZ-1b and LUP-1 shall be implemented to minimize impacts to sensitive receptors.

1.39 *In Table 1-2, the following Noise Mitigation Measure NOI -2 has been moved from the vibration measure and inserted as a Noise Mitigation Measure NOI -1:*

- Pavement breakers and jack hammerers shall be equipped with acoustically attenuated shields or shrouds recommended by the manufacturers.

1.39 *In Table 1-2, the following Noise Mitigation Measure NOI -2 has been changed to read as follows:*

NOI-2: ~~PG&E shall ensure that the following construction vibration mitigation measures are implemented.~~When in close proximity to sensitive receptors, vibratory drivers, instead of conventional pile drivers, shall be used where feasible and effective in reducing noise and vibration impacts ~~noise~~ from shoring of jack-pit and thrust-block excavations.

1.40 *In Table 1-2, the following Public Service Mitigation Measure PS -2b has been changed to read as follows*

PS-2b: Park facilities, including the Bay Trail along Illinois Street between 22nd and 23rd Streets shall not be closed and/or restricted for a period of time exceeding two consecutive ~~months~~weeks, unless there are extenuating circumstances.

2.2-2 *In Aesthetics Section, a portion of 3rd paragraph has been changed to read as follows:*

This is one of the few residential buildings along the proposed project route. **Mitigation Measure LUP-1**, provided in Section 2.9 *Land Use,* ~~Mitigation~~ has been proposed to move the proposed project route from Minnesota Street between 25th Street and Cesar Chavez in order to eliminate any project-related impacts to the residents. The proposed route continues west on Cesar Chavez for several blocks, passing an apartment building at Indiana Street. Caltrain and the ~~Southern~~ Union Pacific rail corridors traverse Cesar Chavez Street, as do two elevated regional freeways, Interstate 280 (I-280) and Highway 101.

2.2-9 *In the Aesthetics section, the 1st sentence in* **Consistency with Adopted Plans and Policies** *section has been changed to read as follows:*

The proposed project would not conflict with the ~~City of~~ San Francisco General Plan Recreation and open Space Element, San Francisco General Plan Urban Design Element, ~~and~~ Central Waterfront Area Plan, or South Bayshore Areas Plan policies on visual quality because it would not affect views of the water or shoreline.

2.3-6 *In the Air Quality Section, the first sentence of the last paragraph has been changed to read as follows:*

An exemption can be granted be BAAQMD if a geological evaluation demonstrates that ultramafic or serpentine rock is not likely to be found. Removal of any asbestos containing materials must be performed in accordance with the California Code of Regulations, Title 8, Section 1529. ~~by a CAL-OSHA certified, licensed asbestos abatement contractor.~~

2.3-7 *In the Air Quality Section, the following sentence has been added to the first complete paragraph (Sensitive Receptors):*

The closest sensitive receptor identified is the residential development on 25th Street, Minnesota Street, and Cesar Chavez Street. **Mitigation Measure LUP-1**, provided in Section 2.9 *Land Use,* has been proposed to move the proposed project route from Minnesota Street between 25th Street and Cesar Chavez in order to eliminate any project-related impacts to the residents.

2.3.-3 *In the Air Quality section, the following Mitigation Measure AQ-2 has been added:*

- **Construction projects that will disturb less than one acre of asbestos containing material, as defined by the California Code of Regulations, Title 17, Section 93000, shall comply with all applicable BAAQMD regulatory requirements.**

2.3-14 *In the Air Quality section, the following Mitigation Measures AQ-2 have been revised:*

- **Construction projects that will disturb more than one acre of asbestos containing material, as defined under California Code of Regulations, Title 17, Section 93000, shall prepare and obtain BAAQMD ~~district~~ approval for an asbestos dust mitigation plan. The plan shall specify how the operation will minimize emissions and must address specific emission sources.**

- **Removal of any asbestos containing materials shall be performed in accordance with the California Code of Regulations, Title 8, Section 1529, which regulates the management and removal of asbestos containing materials. ~~by a CAL-OSHA certified, licensed asbestos abatement contractor.~~**

- **All handling and disposal of ~~toxic~~ hazardous materials and waste shall be done in compliance with applicable regulatory requirements including, but not limited to, those administered by U.S. EPA, BAAQMD, Department of Toxic Substances Control (DTSC), San Francisco RWQCB, and Cal-OSHA~~performed by a certified solid waste facility~~.**

2.7-3 *In the Hazard Section, the following section heading has been revised:*

Electric and Magnetic Field ~~Hazard~~Concerns

2.7-4 *As indicated in Chapter II and in response to comment and E1-8 (Best, Best and Krieger, LLP) the Hazard Section has been revised. The following information has been added:*

Other specific EMF reduction measures may be imposed by the CPUC after its "unprecedented precautionary measures" taken in Final Decision 39112-15 for the Jefferson-Martin 230 kV project. On August 19, 2004, the Commission, in its Final Decision required several changes to PG&E's preliminary EMF management plan for the proposed project. These changes included: adopting a single 4 percent EMF mitigation benchmark for the entire project, lowering the depth of the underground lines to 11 feet deep in all residential areas and by schools, daycare centers, senior centers, parks, and similar public places. Additional unprecedented precautionary measures imposed by the Commission include arranging conductors in a triangular configuration to reduce EMF levels, as well as strategic line placement along the entire route to reduce EMF exposure.

However, the CPUC, on July 30, 2004, filed an Order Instituting Rulemaking that will focus on the determining "if there are improvements that should be made to the Commission's existing rules and regulations concerning electromagnetic fields (EMFs) associated with electric transmission lines or other utility electric facilities" noting that the Commission's interim policy has not been updated in over ten years.

2.7-6 *In the Hazard Section, the following information was moved from 2.7-20 and added as paragraph 3.*

There is the potential for exposure of the public to EMF from the cable line. For the proposed project, most of the underground duct bank would be within roadways. For the proposed single-circuit cable line, the calculated magnetic field strength varies from a maximum of 18.4 mG at the centerline and 2.4 mG at 20 feet from the centerline (PG&E, 2004; Best Best and Kreiger, 2004). The exposure[2] to the driving public therefore would vary from 18.4 mG to 2.4 mG or less depending on distance to the cable. On sidewalks, the pedestrian exposure typically would be 2.4 mG or less, as long as the cable is 20 feet from the edge of the sidewalk. However, where the cable is perpendicular to and beneath the sidewalk the local exposure to pedestrians may be as high as 18.4 mG. This results in a greatly reduced width of exposure as compared to an overhead line. The underground cables would transition to above ground structures at the existing substations at each end of the project route. The field strength of the above ground conductors at the substation fence line has not been provided. In addition, the existing EMF levels induced by other utilities in the project vicinity are not known.

[2] Because the cable line would not ever be able to reach its full operating capacity, these estimated levels of EMF comprise a worst-case EMF scenario.

2.7-7 *The first item in last column in table 2.7-2 of the Hazard Section, which discussed Hunter's Point Power Plant, has been revised:*

~~Soil and groundwater were found to be contaminated with oil, asbestos, trichloroethylene, perchloroethylene, chromium, copper, lead, arsenic, zinc, polychlorinated biphenyls (PCBs), diesel and gasoline, benzene, toluene, ethylbenzene, and xylene (BTEX), solvents, dichlorodiphenyltrichloroethane (DDT), pesticides, and acids. One area of the property has been cleaned up, with low levels of petroleum products remaining in the groundwater. Other areas are undergoing the DTSC process for remediation and closure.~~ The site is listed in the Resource Conservation and Recovery Information System as it generates, transports, and stores hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). There are RCRA generator violations recorded in the EDR report (2004). There are aboveground storage tanks at the facility for diesel; leaks were reported in 1991 and 1998. There are no known pending violations as a result of the leaks.

2.7-22 *The following sentence has been added to the second bulleted item:*

Non-contaminated groundwater shall be released to the stormwater conveyance system (with prior approval). All handling and disposal of hazardous materials and wastes shall be done in compliance with applicable regulatory requirements including, but not limited to, those administered by U.S. EPA, BAAQMD, Department of Toxic Substances Control (DTSC), SF Bay Regional Water Quality Control Board, and Cal OSHA

2.7-22 *In the Hazards section following paragraphs have been removed:*

~~For the proposed single-circuit cable line, the calculated magnetic field strength varies from approximately 18.4 mG directly above the cables, diminishing to approximately 2.4 mG at 20 feet from the line (PG&E, 2004; Best Best and Kreiger, 2004). This distribution appears reasonable for an underground cable, with a high concentration of field strength directly above the cable since it is only a few feet from the ground surface, and with a rapid reduction of strength with distance due to the close spacing of the cables. This results in a greatly reduced width of exposure compared to an overhead line.~~

~~The underground cables would transition to above ground structures at the existing substations at each end of the project route. The field strength of the above ground conductors at the substation fence line has not been provided. In addition, the existing EMF levels induced by other utilities in the project vicinity are not known. For the proposed project, most of the underground duct bank would be within roadways. The exposure to the driving public therefore would vary from 18.4 mG to 2.4 mG or less depending on distance to the cable. On sidewalks, the pedestrian exposure typically would be 20 mG or less, as long as the cable is 20 feet from the edge of the sidewalk. However, where the cable is perpendicular to and beneath the sidewalk the local exposure to pedestrians may be as high as 170 mG.~~

2.8-7 *In the Hydrology section, the last sentence in 3rd paragraph has been removed:*

The SWPPP may include, but is not limited to, description of construction materials, practices, and equipment storage and maintenance, a list of pollutants likely to contact storm water, estimate of the construction site area and percent impervious area, site specific erosion and sedimentation control measures, list of provisions to eliminate or reduce discharge of materials to storm water, and BMPs for fuel and equipment storage. ~~PG&E shall also incorporate into contract specifications the requirements that construction directly adjacent to or across waterways be limited to the dry season, annually from May 1st to November 15th, subject to agreement with the appropriate regulatory agencies. Construction during the dry season minimizes impacts of storm water runoff to the waterways' water quality. In the event of drought or an extended dry season in autumn, the construction permit may be extended at one week increments until the first rain event of over one inch total precipitation.~~

2.11-9 *In the Noise section, the following mitigation measure has been moved from NO-2 and inserted as a mitigation measure for NOI-1.*

- **Pavement breakers and jack hammerers shall be equipped with acoustically attenuated shields or shrouds recommended by the manufacturers.**

2.11-9 *In the Noise section, the following mitigation measure NO-2 has been revised:*

- **Vibratory drivers instead of conventional pile drivers shall be used where feasible and effective in reducing impact noise and vibration from shoring of jack-pit and thrust-block excavations in close proximity to sensitive receptors.**

2.13-4 *In the Public Services section, the following mitigation measure has been revised:*

Mitigation Measure PS-2b: Park facilities, including the Bay Trail along Illinois Street between 22nd and 23rd Streets shall not be closed and/or restricted for a period of time exceeding two consecutive ~~months~~weeks, unless there are extenuating circumstances.

2.15-6 *As indicated in Chapter II and in response to comment E1-1, changes have been made to the Traffic section; the last sentence on the page, which continues to page 2.15-7, has been revised:*

Excavated materials ~~and equipment storage yards~~ would be temporarily stored at PG&E property located north of ~~located near each of the switchyards~~the Potrero Switchyard, while equipment storage/staging areas would be located near each switchyard. Each of the following roadways are paralleled by the proposed project route and may experience lane closures during construction of the project:

2.15-10 *In the Traffic section, the 3rd paragraph has been revised:*

Proposed hours of construction are 7:00 a.m. to 8:00 p.m., in areas where residential receptors exist within 100 feet of construction, or during times set by the City and County of San Francisco in the Excavation Permit and a Special Traffic Permit. Construction traffic would occur throughout the day, thus lessening the effect on peak-hour (commute) traffic (generally 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m.). The project-generated trips would not be substantial relative to background traffic conditions (i.e., would fall within the daily fluctuations of traffic volumes) for these roadways. Therefore, this short-term increase in vehicle trips would not significantly affect level of service and traffic flow on roadways.

2.17-4 *In the Mandatory Findings of Significance, the 3rd paragraph, has been revised:*

There are two planned transmission projects that can help alleviate San Francisco meet growth demand and capacity shortage issues. A planned upgrade to the San Mateo-Martin #4 60 kV to 115kV line, which currently serves San Francisco and was energized in July 2004~~, is scheduled for 2004~~ and is expected to bring as much as 100 megawatts (MW) of new capacity.