

PG&E Gas Pipeline Project

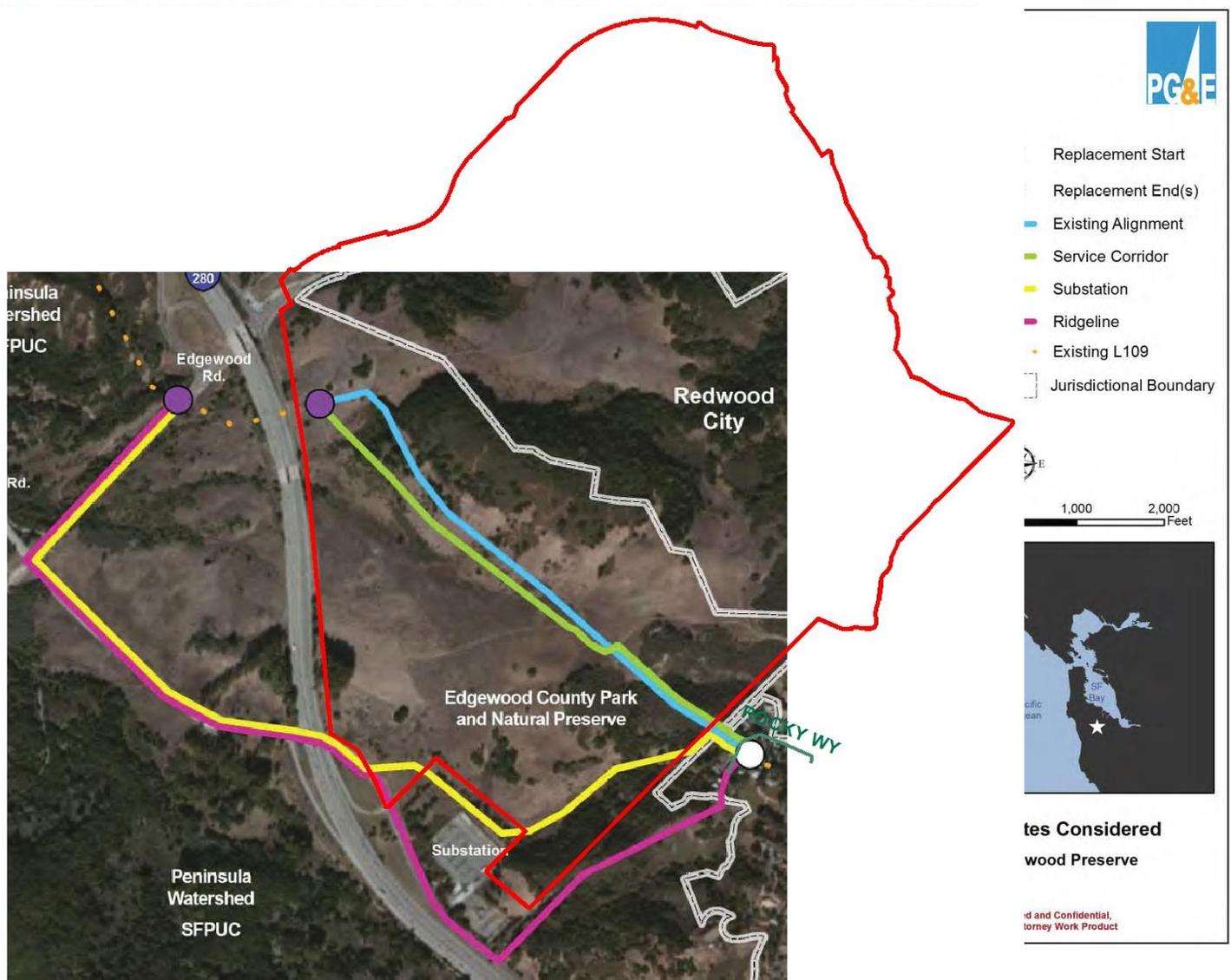
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Project Overview

There are currently 2 gas pipelines that run through Edgewood: lines 109 and 132. 109 dates from the 1930's while 132 was constructed in 1947. Both lines run up and down the peninsula. 109 utilizes 22-inch diameter pipe, which does not allow for automated inspection equipment. 132 is 24 inches in diameter and is fine as is.

PG&E intends to leave 109 in the ground but discontinue its use, and lay a 3rd pipeline of 24-inch diameter. They have evaluated 4 possible routes, three of which cross Edgewood through the grasslands, which is habitat for the threatened Bay checkerspot butterfly and the endangered White-rayed pentachaeta. They have selected one of those routes, the so-called Service Corridor route (green route on map below). It more-or-less follows the trace of the current line. The 4th route, dubbed the Ridgeline route (magenta route), completely circumvents Edgewood.

PG&E's Routing Analysis



Arguments Against Adding a 3rd Pipeline across Edgewood

1. The construction will cause long-term significant impacts to Edgewood's federal- and state-protected unique ecosystem.
 - Edgewood is home to 7 species that are included on the federal or state endangered species list:

- Bay checkerspot butterfly (*Euphydryas editha bayensis*) (federally threatened)
 - San Mateo thornmint (*Acanthomintha duttonii*) (federally endangered)
 - Marin western flax (*Hesperolinon congestum*) (federally threatened)
 - White-rayed pentachaeta (*Pentachaeta bellidiflora*) (federally endangered)
 - Edgewood blind harvestman¹ (*Calicina minor*) (candidate)
 - Edgewood microblind harvestman¹ (*Microcina edgewoodensis*) (candidate)
 - Dusky-footed woodrat (*Neotoma fuscipes annectens*) (California Species of Special Concern)
 - Permits from the USFWS and CDFW are required whenever a “take” of an endangered or threatened species may occur. USFWS defines a “take” to include an incidental take resulting from disruption or disturbance of habitat.
2. The project violates the County’s General Plan management requirements for a Natural Preserve².
- “A Natural Preserve is a scenic and natural area where outstanding features as well as significant wildlife habitats are preserved in their present state for the enjoyment, education and well-being of the public... Preservation and enhancement of the prime resource should be the most important management objective. Interpretation and enjoyment should be secondary management objectives.”
 - “Development should be limited to foot trails, protective barriers, regeneration of indigenous vegetation, overlooks, signs, sanitary facilities, parking areas, interpretive centers and other minimal service facilities as may be required.”
 - “Emphasis should be placed on the protection of rare, endangered, unusual or educationally important natural resources.”
 - “Land used for park and recreation purposes can conflict with various infrastructure projects such as: the widening of existing roads or highways to implement road safety standards; easements granted to provide access to either private dwellings or to **utility companies** to construct power lines or **pipelines**; or from operations extracting minerals from sites immediately adjacent to parkland and the operation has significantly degraded the facility. **Land that has been designated and acquired for use as a park and recreation facility needs to be protected when possible from encroachment by non-recreation uses.**”
3. The project contradicts the Edgewood Master Plan (1997)³.
- The Master Plan defines the following management goals and objectives in this order:
 1. Protect, preserve, and restore Edgewood’s natural resources. This is the primary objective.
 2. Promote environmental awareness and educational opportunities to ensure responsible stewardship of Edgewood’s rare, endangered, and fragile natural resources.
 3. Ensure public enjoyment of Edgewood through low-intensity recreational uses that minimize the need for new construction.
 4. Maintain and manage site improvements at Edgewood, thereby guaranteeing the continuance and maintenance of authorized trails.
 5. Provide access to Edgewood that meets visitor and public service provider needs. Public service providers include emergency response, utility, and park maintenance personnel.
4. The project does not comply with the easement granted to MROSD by the County (1993).
- The easement grants MROSD the “right of design review with respect to any and all improvements and/or development proposed.” The review is advisory only, but can be overridden by the Board of Supervisors. This right of design review covers:
 - Construction of buildings, structures, or other new improvements [Clause 3.a.] and
 - Deviation of the general topography and natural vegetation from its present condition [Clause 3.d.]
 - The easement unconditionally prohibits:
 - Revegetation inconsistent with the intent and purpose of the easement. [Clause 3.c.]
 - Use of the property which does or will materially alter the natural landscape or open space character. [Clause 3.e.]
 - Disturbing or changing the natural habitat in any manner. [Clause 3.g.]
 - Public use other than parks, recreation, scenic or open space uses. [Clause 3.h.]

¹ Ref. http://ecos.fws.gov/docs/federal_register/fr2729.pdf

² Resolution No. 56062 passed by SMC Board of Supervisors on May 5, 1992 designated Edgewood a Natural Preserve in perpetuity.

³ Edgewood Park & Natural Preserve Master Plan, adopted May 1997, Environmental Services Agency, San Mateo County.

- Construction of any residential, commercial or industrial structure. [Clause 3.m.]
- The easement further requires the County to make every effort not to damage, destroy or otherwise infringe upon the areas currently occupied by colonies of rare and/or endangered plant and animal species. [Clause 3.j.]

Least Environmentally Damaging Alternative

PG&E should select the Ridgeline route for the new pipeline, circumventing Edgewood Park entirely. This route avoids impacts to Edgewood's environmentally sensitive habitats, (2) maintains consistency with the County's General Plan, (3) abides by the goals and objectives of the adopted Edgewood Master Plan, and (4) adheres to the County's easement with Midpeninsula Regional Open Space District.