

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10th Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

October 1, 2026

MEMO TO: Stanislaus County Planning Commission

FROM: Department of Planning and Community Development

SUBJECT: GENERAL PLAN CONSISTENCY FINDING FOR THE SAN FRANCISCO PUBLIC UTILITIES COMMISSION TRANSMISSION LINE CLEARANCE MITIGATION PROJECT

Stanislaus County received a letter dated August 11, 2026, from the San Francisco Public Utilities Commission (SFPUC) requesting a General Plan consistency determination be made regarding proposed work within Hetch Hetchy-owned transmission line rights-of-way (see Attachment A - *General Plan Consistency Request, dated August 11, 2026*).

The transmission lines deliver hydroelectricity generated at Hetch Hetchy Power System hydroelectric powerhouses to PG&E substations in the City of Newark. Within Stanislaus County, work consisting of foundation retrofits and grading, structural retrofits of towers, tower height increases (ranging from 15- to 25-feet for a maximum tower height of 145-foot), and equipment replacements are proposed to occur at approximately 126 locations. The overall work areas will take up approximately 50-foot perimeters outside the base of each tower, and within existing SFPUC right-of-way and will be accessed via existing easements and access roads. No new access roads are proposed as part of this request. It is County staff's understanding that SFPUC will provide notice to affected and surrounding landowners prior to commencement of project activities.

Immunity from County Zoning

California's intergovernmental immunity doctrine pursuant to Government Code Section 53091, grants public agencies immunity from cities' and counties' respective zoning and building codes. This project will not be required to go through the County's land use entitlements or building permitting processes, but the proposed project is required to obtain from the County a conformity review with the County's General Plan. The SFPUC is responsible for completing environmental review in compliance with the California Environmental Quality Act. The SFPUC filed a Common Sense Exemption for the project, on January 6, 2026.

General Plan Conformity Analysis

A determination on the proposed works' conformity with the General Plan is being requested of the Planning Commission pursuant to Government Code Section 65402, which requires a General Plan conformity determination be made by the planning agency having jurisdiction prior to construction or authorization of a public building or structure by a public agency.

The Stanislaus County General Plan contains several elements (including, but not limited to, Land Use and Safety Elements) which identify goals, policies, and implementation measures that directly support public utilities; however, there is nothing specific to public utility transmission and distribution lines – only public buildings and grounds.

Section 21.080.020(C) of the County's Zoning Ordinance recognizes public utility transmission and distribution lines, both overhead and underground, as being permitted in all districts and provides for Planning Commission review of routes of proposed electrical transmission lines (including height, and placement of towers) prior to acquisition of right-of-way when not within a public street or highway. In this case, the route already exists and proposed alterations will be occurring within existing right-of-way that have already been acquired.

As the facilities are existing, staff does not find that any of the activities being proposed by the SFPUC would be in conflict with the County's General Plan goals, policies, and implementation measures.

RECOMMENDATION

Based on the analysis provided in this report, staff recommends that the Planning Commission make the following findings:

1. Find that the proposed transmission line project is consistent with various goals, policies, and implementation measures of the Stanislaus County General Plan and, therefore, are considered to be consistent with the General Plan.

Contact Person: Kristen Anaya, Senior Planner, (209) 525-6330

Attachments:

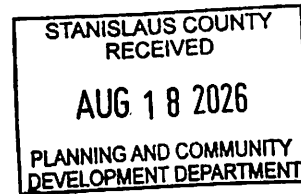
Attachment A - General Plan Consistency Request, dated August 11, 2026
Attachment B - Site Maps



San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

Environmental Management
525 Golden Gate Avenue, 11th Floor
San Francisco, CA 94102
T 415.934.5700
F 415.934.5750
TTY 415.554.3488



August 11, 2026

Ms. Kristin Doud
Deputy Director
Stanislaus County Planning and Community Development Department
1010 10th Street, Suite 3400
Modesto, CA 95354
Email: doudk@stancounty.com

Via Email and Certified Mail

Subject: San Francisco Public Utilities Commission's Transmission Line
Clearance Mitigation Project

Dear Ms. Doud:

The City and County of San Francisco, through the San Francisco Public Utilities Commission (SFPUC), submits this letter seeking a general plan conformity determination under California Government Code Section 65402(b) from the Stanislaus County Planning and Community Development Department for the SFPUC's Transmission Line Clearance Mitigation Project (project).

The SFPUC owns and operates the Hetch Hetchy Power System which includes three hydroelectric powerhouses. Hydroelectricity generated at these facilities is delivered using SFPUC-Hetch Hetchy-owned transmission lines within its 168-mile rights-of-way to a PG&E substation in the city of Newark where the power is passed through to San Francisco. The SFPUC's transmission facilities consist of 11 transmission lines and are located within Tuolumne, Mariposa, Stanislaus, San Joaquin, and Alameda counties. To ensure sufficient clearance between the conductors and the ground, SFPUC would conduct one of the following at over 100 locations (locations may have multiple towers) along the transmission lines:

- **Limited Grading/Site Clearing:** Limited grading beneath the conductors (power lines) to increase the clearance distance between the ground and power lines.

Daniel Lurie
Mayor

Joshua Arce
President

Stephen E. Leveroni
Vice President

Avni Jamdar
Commissioner

Kate H. Stacy
Commissioner

Meghan Thurlow
Commissioner

Dennis J. Herrera
General Manager

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ATTACHMENT A

- ***Increase Tension:*** Increasing tension on existing power lines to raise conductors to meet requirements on sections between dead-end towers.
 - ***Insulator Replacement (Floating Dead-ends):*** Replacing existing insulators on the arms of the tower from a vertical suspension to a horizontal orientation.
 - ***Insulated Crossarms:*** Replacing the tower arms with a high-strength insulator assembly that allows for the power lines to be raised up just underneath the arms
 - ***Tower Raises:*** Increasing the height of the tower and thus the transmission lines
-
- ***Tower Replacement:*** Replace the existing tower with a taller tower
 - ***New Midspan Tower:*** Constructing a new mid-span tower in-line with the existing transmission alignment to raise up the existing power line(s)
 - ***Reconductor:*** Replacing the power lines with new High-Temperature Low-Sag power lines (reconductor)
 - ***Hybrid Solutions:*** Implementing a combination of one or more of the above solutions.

The overall work area would be up to an approximate 50-foot perimeter outside the base of each tower. Staging areas would likely be accommodated within the existing SFPUC rights-of-way and would center around the various tower locations. The staging areas would be used for storage of materials, construction vehicles, equipment, worker facilities, and dumpsters to temporarily store discarded materials. Access to the rights-of-way, grading sites, and existing towers would be via interstates/highways/state routes, city/county streets, and paved/dirt access roads. No new access roads outside of the rights-of-way are currently planned as part of the project.

Within Stanislaus County, there are approximately 126 locations where work will be conducted to the transmission facilities including foundation retrofits and grading, and possibly structural retrofits, tower raises, and equipment replacements. Work is also anticipated to include the installation of one midspan tower between Towers 366N and 368N in the City of Riverbank.

The project construction is anticipated to start in early 2027. Construction of the entire project would require a total of approximately 36 months. The work duration at each individual tower location will vary depending on the type of

mitigation strategy pursued and could range from a few days for grading to six weeks for tower replacement or installation of a mid-span structure

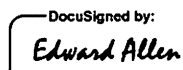
Government Code Section 65402(b) requires that, prior to constructing a public building or structure in another city or county, the SFPUC must request your review of the project's conformity with the County's adopted general plan. If the County does not respond within 40 days of this request, the project is deemed to be in conformity with the general plan.

Although Section 65402(b) requires the above review, California's intergovernmental immunity doctrine immunizes the SFPUC from the building and zoning ordinances of other cities and counties when the SFPUC performs work on property outside of San Francisco, regardless of whether the SFPUC owns the property, or when SFPUC leases or acquires property for public purposes in other cities and counties.¹

A Common Sense Exemption was issued by the San Francisco Planning Department for the Transmission Line Clearance Mitigation Project on January 6, 2026 (San Francisco Planning Department Case No. 2024-002876ENV). The Common Sense Exemption is available to download from this [link](#).

This letter is provided to satisfy the noticing requirements of Government Code Section 65402(b) and does not necessarily require any action or reply on the part of the County. If you wish to respond, please contact me at eallen@sfpuc.org or (209) 989-2840 or if you have questions on the project, please contact Jeff Wasserloos at jawasserloos@sfpuc.org or (602) 214-6976. Thank you in advance for your attention to this matter.

Sincerely,

DocuSigned by:


Edward Allen, PE

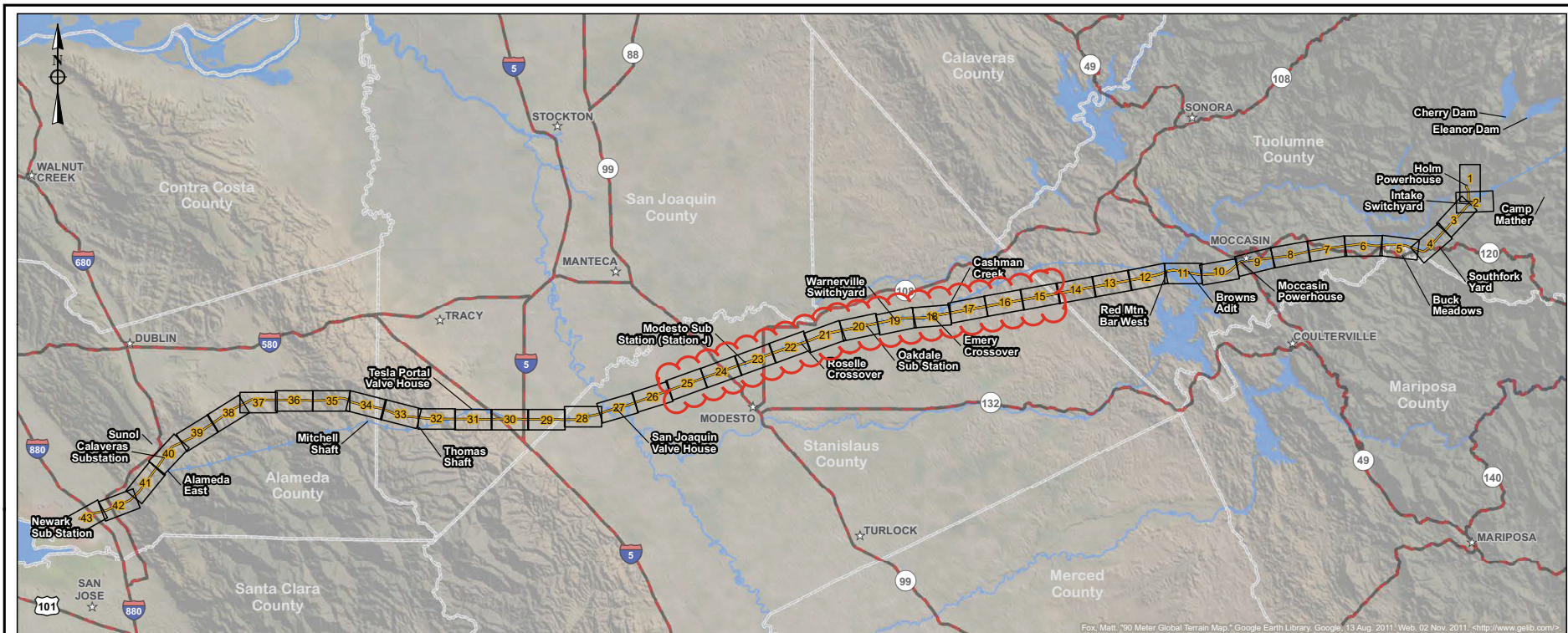
Principal Engineer

Strategic Capital Planning & Special Projects Manager

SFPUC / Hetch Hetchy Water & Power

Copy to: Sue Chau, Acting Environmental Management Manager, SFPUC

¹ See *Lawler v. City of Redding* (1992) 7 Cal. App. 4th 778, 782-783 (Government Code Sections 53090 and 53091 prevail over the provision of Section 65402(b)), and an early case involving Sonoma County and the City of Santa Rosa, *Akins v. County of Sonoma* (1967), 67 Cal. 2d 185, 194.



DATA REFERENCES:

Aerial Imagery used in this mapbook was provided by Bing Maps (c) 2010 Microsoft Corporation and its data suppliers. Used under license from Environmental Systems Research Institute.

(1) - SFPUC Database

(2) - Hydrography - National Hydrography Dataset high-resolution, U.S. Geological Survey, April 2010, Available through <http://viewer.nationalmap.gov>.

(3) - Hetch Hetchy Water and Power, Sept. 2011

(4) - California Department of Forestry (using data from BOR and DOC FMMP), 2004, Available through <http://frap.cdf.ca.gov/data.html>

(5) - Modified from USA. U.S. Department of Commerce. U.S. Census Bureau. TIGER/Line Files. Web. <<http://www.census.gov/geo/www/tiger>>.

(6) - Extracted, merged, and modified from multiple sources. For display purposes only.

(7) - SNF. "Trails." GIS Clearinghouse. US Forest Service, Dec. 2007. Web. July 2010. <<http://www.fs.fed.us/r5/rs/clearinghouse/r5gis/transportation/>>.

Yosemite National Park, GIS lab, Nov. 5 2000, "YNP_Trails" Division of Resources Management & Science, Physical Sciences & GIS branch, Yosemite National Park, EL Portal.



Services of the San Francisco Public Utilities Commission

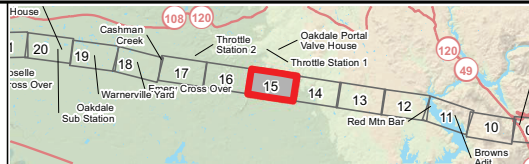
HETCH HETCHY POWER TRANSMISSION

From Holm Powerhouse to Newark Substation

NOTE: Please submit any changes, questions, or concerns to HHWP Survey, George Ball, Phone 209-989-2081, E-mail gball@sfwater.org

SCALE:	1:12,000
DATE:	10/12/2011
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CHECKED BY:	K. BOLTER
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SIZE: 11X17 DATE: 1/4/2013



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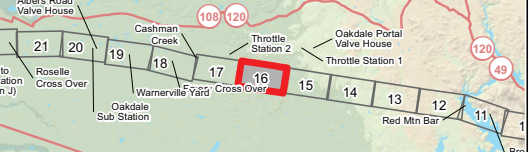




Hetch Hetchy Regional Water System
Services of the San Francisco Public Utilities Commission

LEGEND

Penstock	115 kV	Dead End Stream X'ing
Pipeline	230 kV	Heavy Duty
Siphon	Helipad	Heavy Duty at Navigable
Tunnel	Highway	Heavy Duty Dead End
Canal / Ditch	Paved Rd.	Line Switch
Stream / River	Unpaved Rd.	Special Dead End
Waterbody	Trail	Standard
Wetland / Marsh	Railroad	Substation SW.
County Bnd.		Transposition



HETCH HETCHY POWER TRANSMISSION

From Holm Powerhouse to Newark Substation

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DATE: **10/12/2012**

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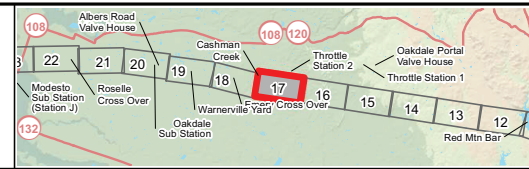
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SHEET **16** OF **43**

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LEGEND	Penstock	115 kV	Transmission Towers
	Pipeline	230 kV	
Siphon	Canal / Ditch	Helipad	Dead End Stream X'ing
Tunnel	Stream / River	Highway	Heavy Duty
Waterbody	Wetland / Marsh	Paved Rd.	Heavy Duty at Navigable
County Bnd.		Unpaved Rd.	Heavy Duty Dead End
		Trail	Line Switch
		Railroad	Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Transposition

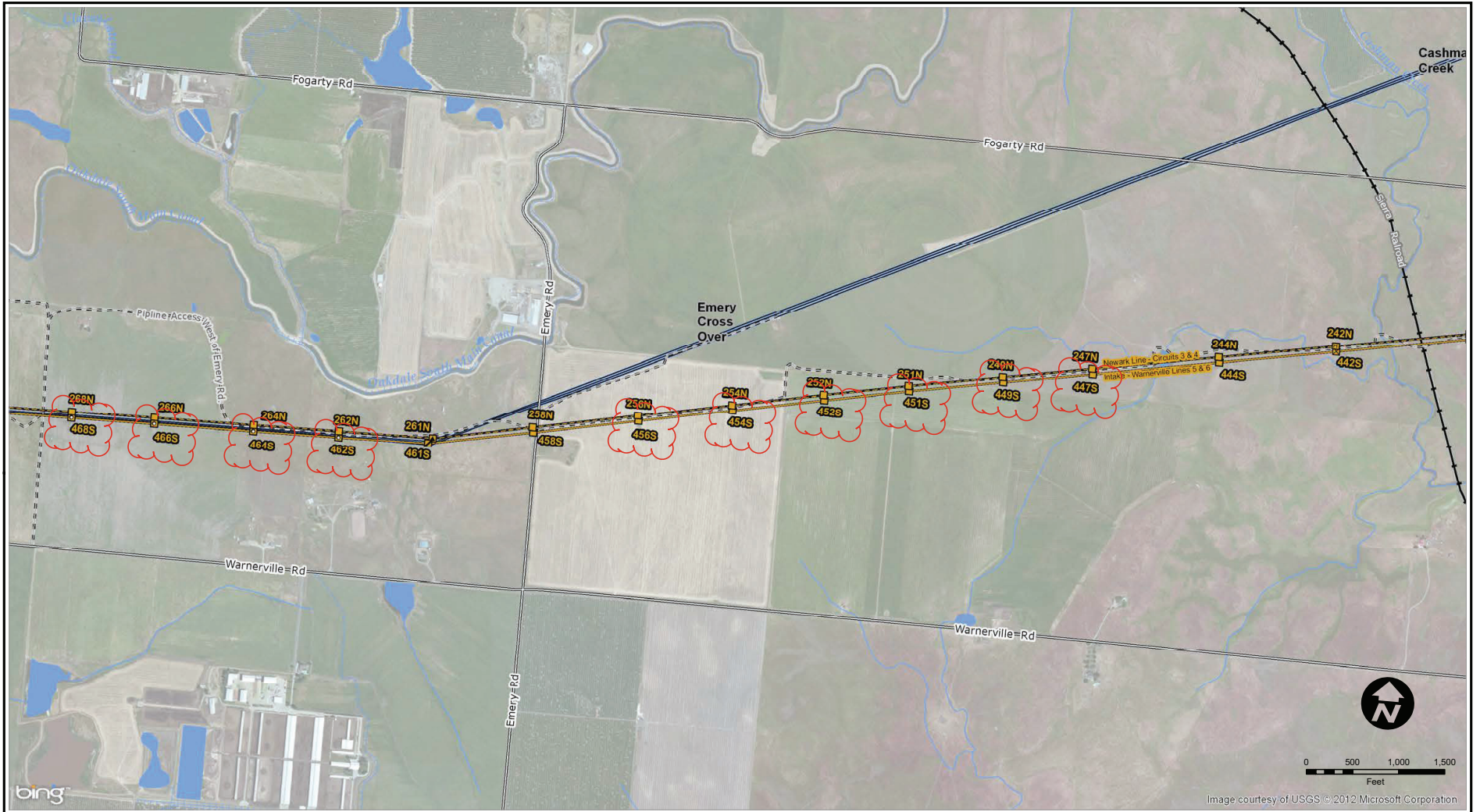


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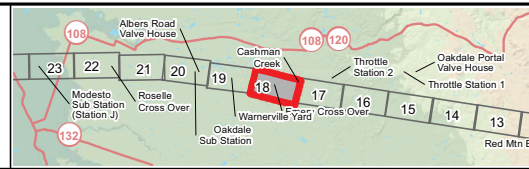
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	SHEET 17 OF 43

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LEGEND	Penstock	115 kV	Transmission Towers
	Pipeline	230 kV	
Siphon	Canal / Ditch	Stream / River	Dead End Stream X'ing
Tunnel	Waterbody	Wetland / Marsh	Heavy Duty
County Bnd.			Heavy Duty at Navigable
			Heavy Duty Dead End
			Line Switch
			Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Transposition
			Helipad
			Highway
			Paved Rd.
			Unpaved Rd.
			Trail
			Railroad



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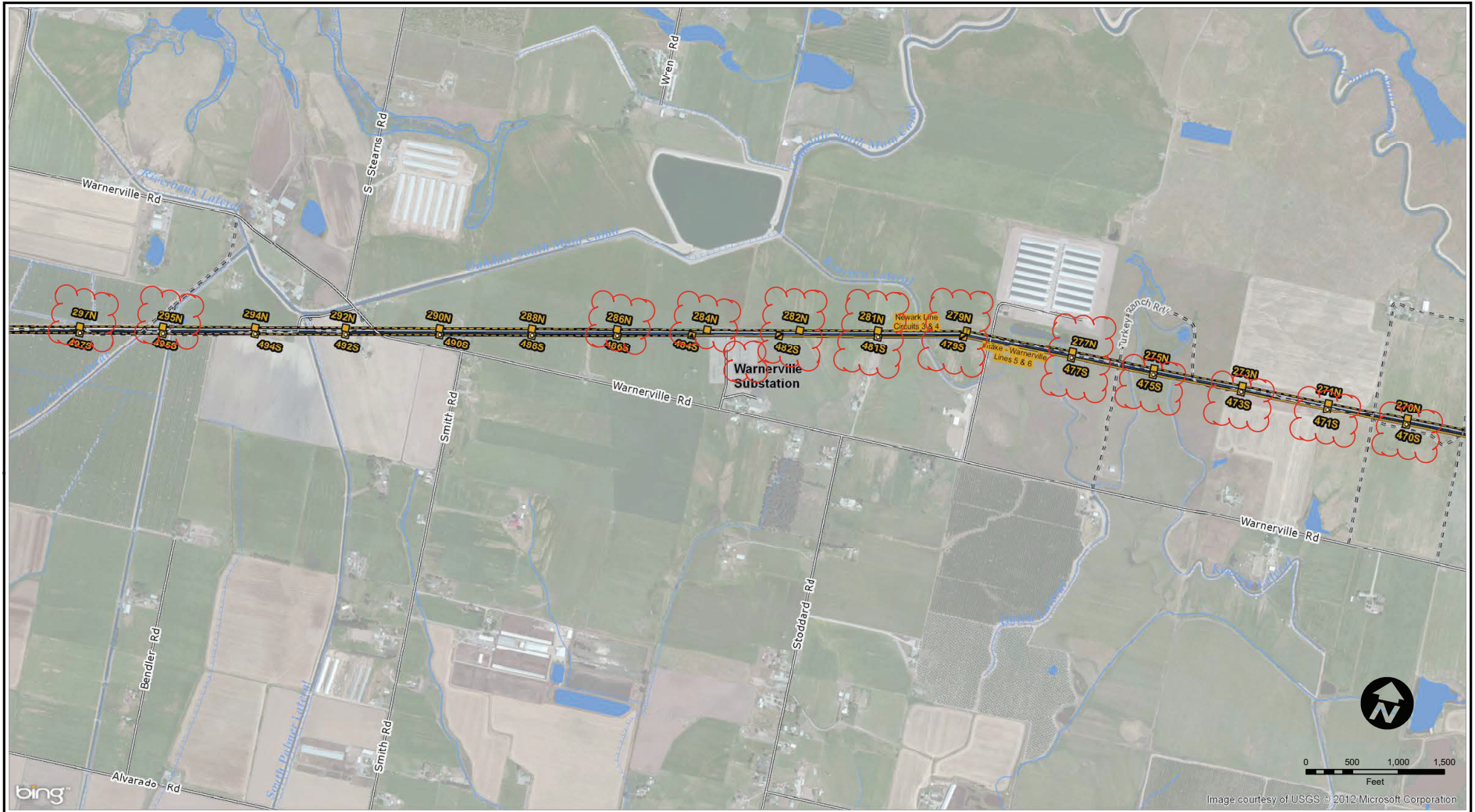
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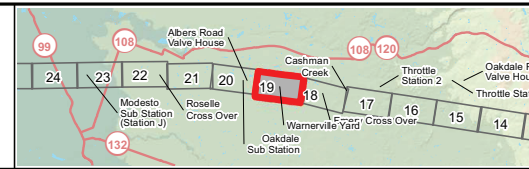
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SHEET 18 OF 43

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Siphon	Canal / Ditch	Stream / River	Dead End Stream X'ing
Tunnel	Waterbody	Wetland / Marsh	Heavy Duty
County Bnd.			Heavy Duty at Navigable
			Heavy Duty Dead End
			Line Switch
			Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Transposition
		Helipad	
		Highway	
		Unpaved Rd.	
		Trail	
		Railroad	



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POWER
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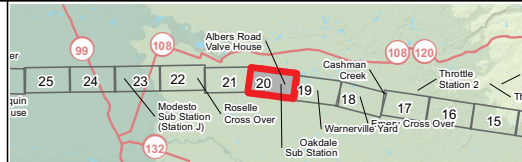
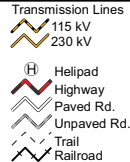
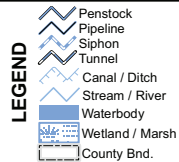
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	SHEET 19 OF 43

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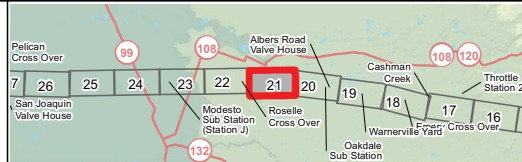
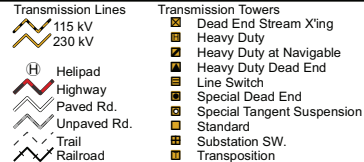
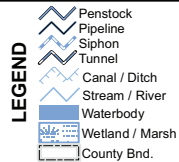
SHEET **20** OF **43**

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Hetch Hetchy
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Water
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**HETCH HETCHY
POWER
TRANSMISSION**

**From Holm Powerhouse
to Newark Substation**

SCALE: **1:12,000**

DATE: **10/12/2012**

CREATED BY: **G.BALL**

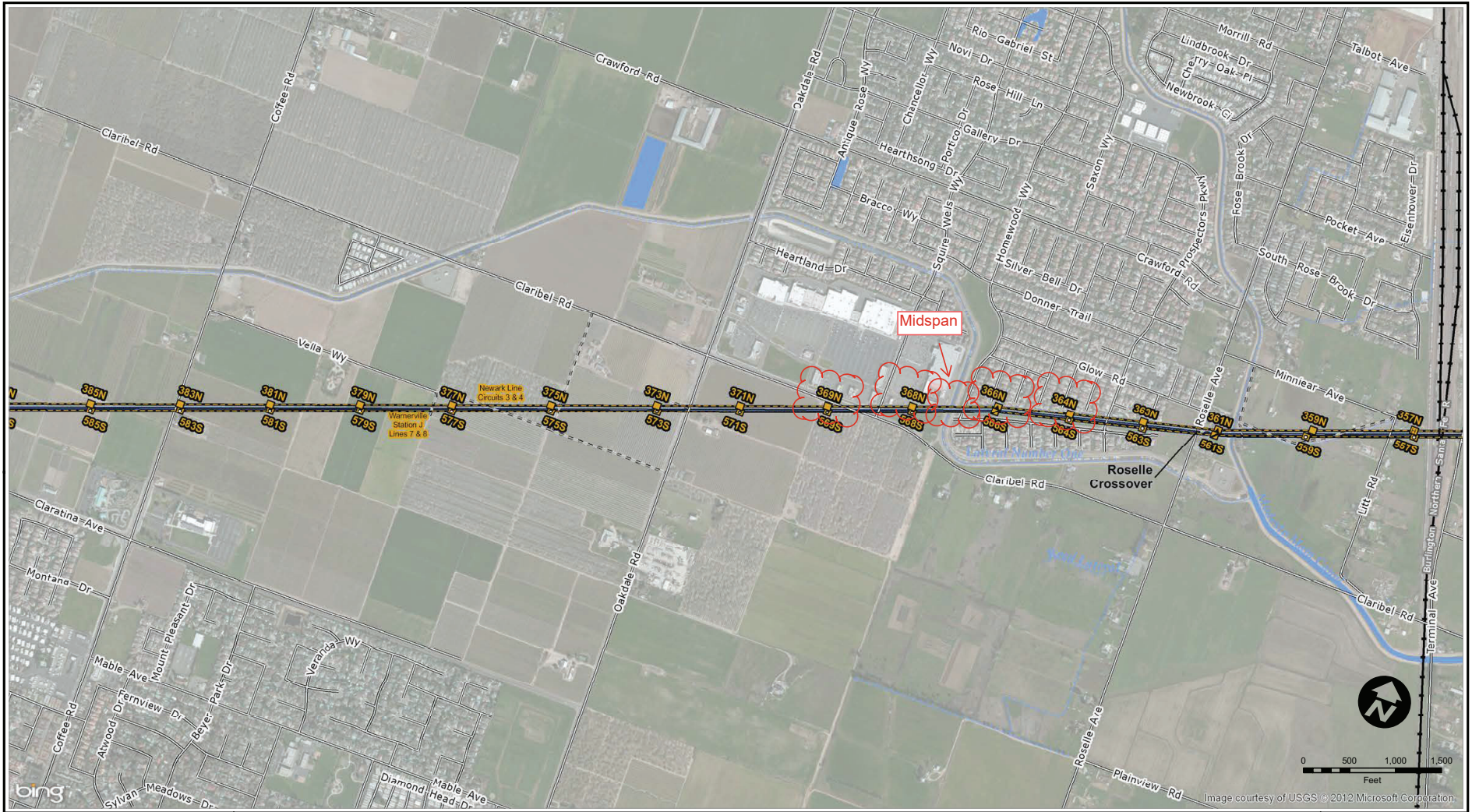
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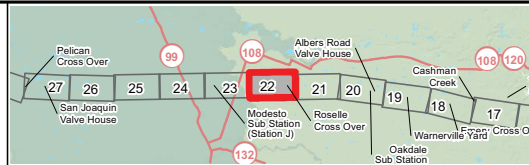
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SHEET **21** OF **43**

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LEGEND	Penstock	Transmission Lines 115 kV	Transmission Towers
	Siphon	Transmission Lines 230 kV	Dead End Stream X'ing
Canal / Ditch	Stream / River	Helipad	Heavy Duty
Tunnel	Waterbody	Highway	Heavy Duty at Navigable
Wetland / Marsh	County Bnd.	Unpaved Rd.	Special Dead End
		Trail	Special Tangent Suspension
		Railroad	Standard
			Substation SW.
			Transposition



HETCH HETCHY POWER TRANSMISSION

From Holm Powerhouse to Newark Substation

SCALE: 1:12,000

DATE: 10/12/2012

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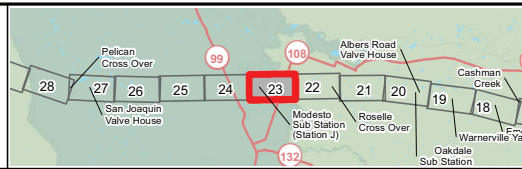
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SHEET 22 OF 43

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LEGEND	Penstock	115 kV	Transmission Towers
	Pipeline	230 kV	
Siphon	Canal / Ditch	Stream / River	Dead End Stream X'ing
Waterbody	Wetland / Marsh	Highway	Heavy Duty at Navigable
County Bnd.		Unpaved Rd.	Heavy Duty Dead End
		Trail	Line Switch
		Railroad	Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Transposition

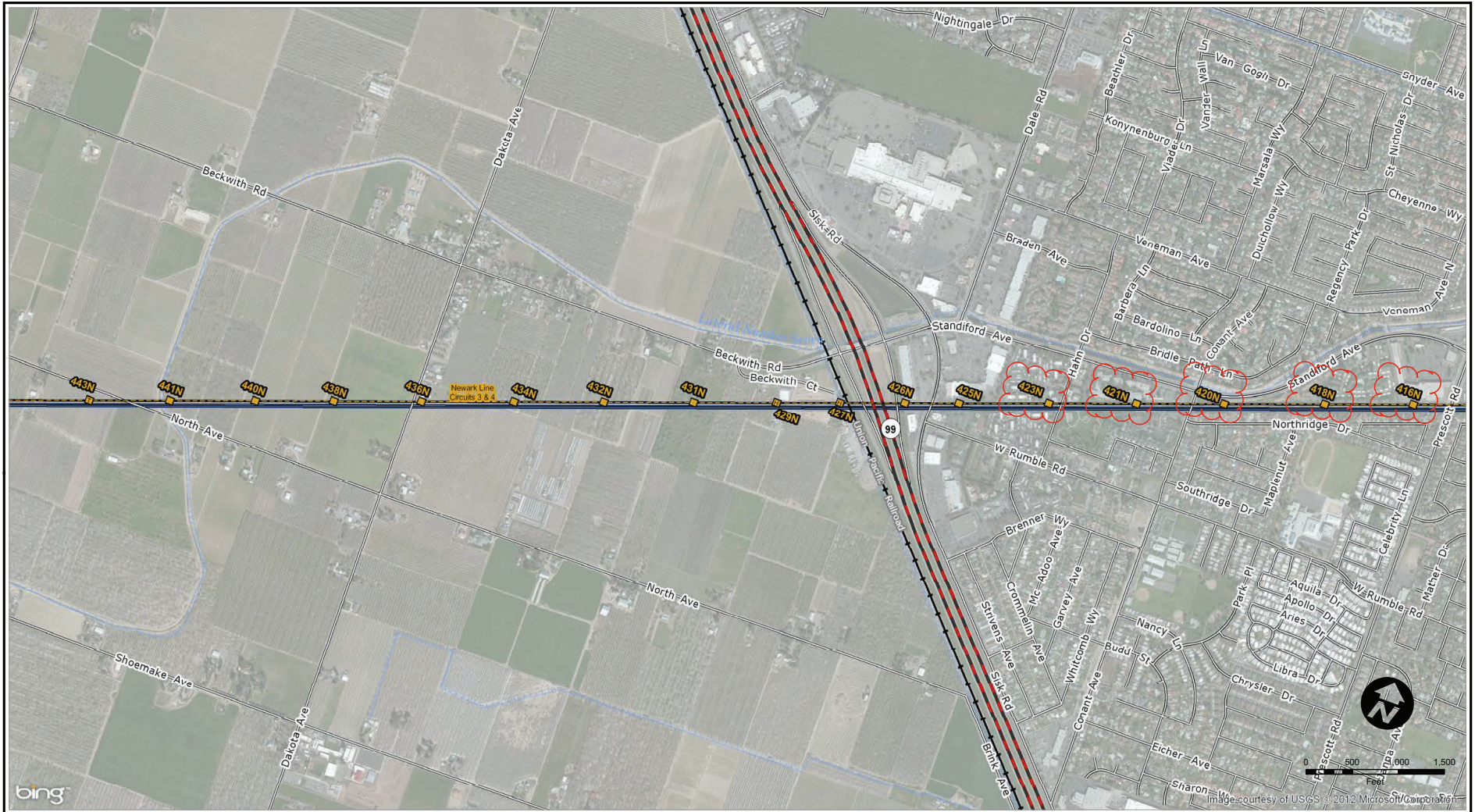


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POWER
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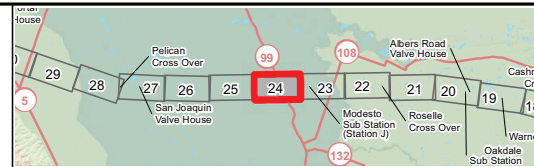
**From Holm Powerhouse
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SHEET	23 OF 43

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LEGEND	Penstock	115 kV	Dead End Stream X'ing
	Siphon	230 kV	Heavy Duty
Tunnel	Canal / Ditch	Helipad	Heavy Duty at Navigable
Stream / River	Waterbody	Highway	Heavy Duty Dead End
Wetland / Marsh	County Bnd.	Paved Rd.	Line Switch
		Unpaved Rd.	Special Dead End
		Trail	Special Tangent Suspension
		Railroad	Standard
			Substation SW.
			Transposition



HETCH HETCHY POWER TRANSMISSION

From Holm Powerhouse to Newark Substation

SCALE: 1:12,000

DATE: 10/12/2012

CREATED BY: G.BALL

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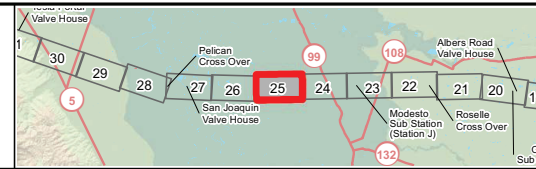
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SHEET 24 OF 43

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LEGEND	Penstock	Transmission Lines 115 kV	Transmission Towers
	Siphon	Transmission Lines 230 kV	Dead End Stream X'ing
Tunnel	Canal / Ditch	Stream / River	Heavy Duty
Waterbody	Wetland / Marsh	County Bnd.	Heavy Duty at Navigable
			Heavy Duty Dead End
			Line Switch
			Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Trail
			Railroad
			Transposition
			Helipad
			Highway
			Paved Rd.
			Unpaved Rd.



**HETCH HETCHY
POWER
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**From Holm Powerhouse
to Newark Substation**

SCALE:	1:12,000
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	SHEET 25 OF 43

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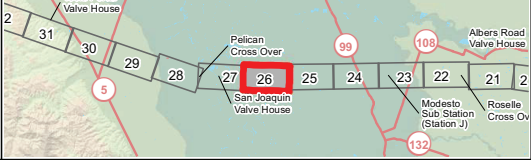


**Hetch Hetchy
Regional
Water
System**

Services of the San Francisco Public Utilities Commission

LEGEND

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Canal / Ditch	Highway	Heavy Duty Dead End
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Waterbody	Unpaved Rd.	Special Dead End
Wetland / Marsh	Trail	Special Tangent Suspension
County Bnd.	Railroad	Standard
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		Transposition



**HETCH HETCHY
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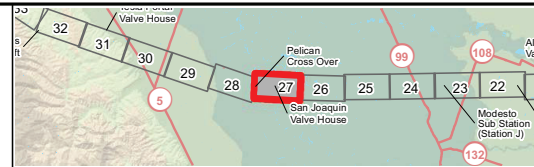
HS-11059-MB

SHEET **26** OF 43

NOTE: Please submit any changes, questions, or concerns to HHWP Survey, George Ball, Phone 209-989-2081, E-mail gball@sfwater.org



LEGEND	Penstock	115 kV	Transmission Towers
	Pipeline	230 kV	
Siphon	Canal / Ditch	Stream / River	Dead End Stream X'ing
Tunnel	Waterbody	Wetland / Marsh	Heavy Duty
	County Bnd.		Heavy Duty at Navigable
		Helipad	Heavy Duty Dead End
		Highway	Line Switch
		Paved Rd.	Special Dead End
		Unpaved Rd.	Special Tangent Suspension
		Trail	Standard
		Railroad	Substation SW.
			Transposition



HETCH HETCHY POWER TRANSMISSION

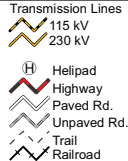
From Holm Powerhouse to Newark Substation

SCALE:	1:12,000
DATE:	10/12/2012
CREATED BY:	G.BALL
CHECKED BY:	K. BOLTER
DRAWING #:	HS-11059-MB
	SHEET 27 OF 43

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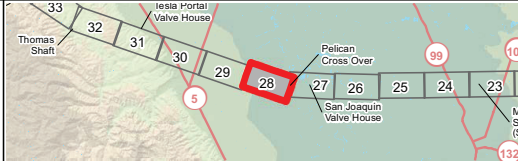


Services of the San Francisco Public Utilities Commission



Transmission Towers

-  Dead End Stream X'ing
-  Heavy Duty
-  Heavy Duty at Navigable
-  Heavy Duty Dead End
-  Line Switch
-  Special Dead End
-  Special Tangent Suspension
-  Standard
-  Substation SW.
-  Transposition



HETCH HETCHY POWER TRANSMISSION

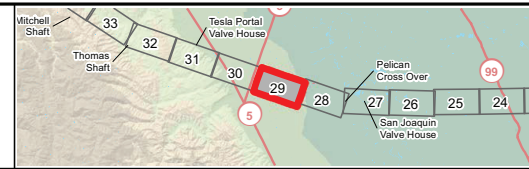
From Holm Powerhouse
to Newark Substation

SCALE:	1:12,000
DATE:	10/12/2012
CREATED BY:	G.BALL
CHECKED BY:	K. BOLTER
DRAWING #:	
HS-11059-MB	
SHEET 28 OF 43	

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LEGEND	Penstock	115 kV	Transmission Towers
	Pipeline	230 kV	
Siphon	Canal / Ditch	Stream / River	Dead End Stream X'ing
Tunnel	Waterbody	Wetland / Marsh	Heavy Duty
County Bnd.			Heavy Duty at Navigable
			Heavy Duty Dead End
			Line Switch
			Special Dead End
			Special Tangent Suspension
			Standard
			Substation SW.
			Transposition
			Helipad
			Paved Rd.
			Unpaved Rd.
			Trail
			Railroad



**HETCH HETCHY
POWER
TRANSMISSION**

**From Holm Powerhouse
to Newark Substation**

SCALE:	1:12,000
DATE:	10/12/2012
CREATED BY:	G.BALL
CHECKED BY:	K. BOLTER
DRAWING #:	HS-11059-MB
SHEET	29 OF 43

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