3.0 RESPONSES TO COMMENTS

This Section provides copies of the written comments submitted on the Draft EIR. No public comments were made at the two Public Hearings held on January 9, 2008, so no public comment transcripts were recorded. Each comment set is presented chronologically and is immediately followed by the corresponding responses. The comments from PG&E are presented at the end of the comment letters as Comment Set H. Errata and minor text clarifications are included in Section 4.

Table 3-1 lists all comment sets and shows the comment set identification letter for each.

Table 3-1. Commenters and Comment Set Numbers

Agency/Affiliation	Name of Commenter	Date of Comment	Draft EIR Comment Set
Caltrans Office of Metropolitan Planning	Tom Dumas	12/05/2007	A
DWR Floodway Protection Section	Christopher Huitt	12/06/2007	B
Sacramento Regional County Sanitation District	Elizabeth Obon	12/27/2007	C
Reclamation District 1002	Robert Abercrombie	12/28/2007	D
Cosumnes River Preserve	Harry L. McQuillen, et al.	01/10/2008	E
Sacramento Regional County Sanitation District	Sarenna Deeble	01/09/2008	F
Central Valley Regional Water Quality Control Board	Anne L. Olson, PE	01/10/2008	G
Pacific Gas and Electric Company	Michael A. Gunby	01/14/2008	H

1 **COMMENT SET A**

STATE OF CALIFORNIA — BUSINESS, TRANSPORTATION AND HOUSING AGENCY — ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 2048 STOCKTON, CA 95201
(1976 E. CHARTER WAY/1976 E. DR. MARTIN
LUTHER KING JR. BLVD. 95205)
TTY: California Relay Service (800) 735-2929
PHONE (209) 941-1921
FAX (209) 948-7194

Flex your power!
Be energy efficient

December 5, 2007

10-SJ-Various
SCH# 2006102033
PG&E Line 108
Natural Gas Pipeline

Crystal Spur
City and County of San Francisco
Planning Department
1650 Mission Street Suite 400
San Francisco, CA 94103

Dear Ms. Spur

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Draft Environmental Report (DEIR) for the proposed PG&E Line 108 Natural Gas Pipeline replacement through the counties of San Joaquin and Sacramento. The Department has the following comments:

- Please contact the department for any planned construction of pipeline crossing the State facilities.

- An encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act (CEQA). Therefore, environmental studies may be required as part of the encroachment permit application including biological, cultural resources, and exposure to hazardous materials. A qualified professional must conduct any such studies undertaken to satisfy the Department's environmental review responsibilities. Ground disturbing activities to the site prior to completion and/or approval of required environmental documents may affect the Department's ability to issue a permit for the project. Furthermore, if engineering plans or drawings will be part of your permit application, they should be prepared in standard units.

A-1

"Caltrans improves mobility across California"

2

Ms. Spur
December 5, 2007
Page 2

If you have any questions or would like to discuss our comments in more detail, please contact Kathy Selsor at (209) 948-7190 (e-mail: kathy_selsor@dot.ca.gov) or me at (209) 941-1921.

Sincerely,

Kathy Selsor

for TOM DUMAS, CHIEF
OFFICE OF METROPOLITAN PLANNING

c: SMorgan CA Office of Planning and Research

"Caltrans improves mobility across California"

1

RESPONSE TO COMMENT SET A

A-1 No crossing of State roadways or rights of way would occur as part of this proposed Project, so an encroachment permit from Caltrans would not be required. Section 4.7, Traffic and Transportation, page 4.7-5 of the Draft EIR notes that Caltrans permits would be obtained, as necessary, for any oversized loads that would travel on State roadways (I-5 and SR 99) in the project area.

1 **COMMENT SET B**

STATE OF CALIFORNIA – THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

December 6, 2007

Crystal Spurr
California State Lands Commission
100 Howe Avenue, Suite 100
Sacramento, California 95825

PG&E Line 108 Natural Gas Pipeline Project
State Clearinghouse (SCH) Number: 2006102033

The project corresponding to the subject SCH Identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at http://recbd.ca.gov/. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on ar adopted food control plan, you will need to obtain an encroachment permit from the Reclamation Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly. B-1

If after careful evaluation, it is your assessment that your project is not within the authority of the Reclamation Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

Christopher Hultt
Staff Environmental Scientist
Floodway Protection Section

Enclosure

cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

2

Encroachment Permits Fact Sheet

Basis for Authority
State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks the Reclamation Board with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

Area of Reclamation Board Jurisdiction
The adopted plan of flood control under the jurisdiction and authority of the Reclamation Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by the Reclamation Board can be found in Title 23 Section 112. Information on designated floodways can be found on the Reclamation Board's website at http://recbd.ca.gov/designated_floodway/ and CCR Title 23 Sections 101 - 107.

Regulatory Process
The Reclamation Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of the Reclamation Board.

Details regarding the permitting process and the regulations can be found on the Reclamation Board's website at http://recbd.ca.gov/ under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on the Reclamation Board's website at http://recbd.ca.gov/forms.cfm.

Application Review Process
Applications when deemed complete will undergo technical and environmental review by Reclamation Board and/or Department of Water Resources staff.

Technical Review
A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may caused by the project.

Additional information may be requested in support of the technical review of

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your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

Environmental Review

A determination on an encroachment application is a discretionary action by the Reclamation Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, the Reclamation Board will be assuming the role of a "responsible agency" within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the "lead agency" [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

- California Department of Fish and Game Streambed Alteration Notification (http://www.dfg.ca.gov/1600/),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available. Transmittal information should reference the application number provided by the Reclamation Board.

In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by Reclamation Board. In these limited instances, the Reclamation Board

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may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Reclamation Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.

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RESPONSE TO COMMENT SET B

B-1 As described in Section 4.4, Hydrology and Water Quality, page 4.4-12 of the Draft EIR, the southern portion of the proposed pipeline route that extends from the south bank of the Mokelumne River to a point about 5,250 feet to the north near the second HDD exit area, lies within the Cosumnes River Designated Floodway. CCR Title 23, section 123 (f) (3), the section of code governing the Reclamation Board's authority, contains the following condition: "If the installation is to be more than fifty (50) feet below the levee and the entire floodway and streambed, the board may waive the requirement for a permit provided a letter of intent is filed with the board prior to commencement of the project." As such, PG&E would file a letter of intent and, if necessary, acquire a permit in order to confirm Reclamation Board approval before beginning work within the designated floodway.

1 **COMMENT SET C**

SRCSD

Wastewater Treatment

Technology in Balance with Nature

10545 Armstrong Avenue
Mather, CA 95655
Tele: (916) 876-6000
Fax: (916) 876-6160
Website: www.srcsd.com

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County of Yolo
City of Citrus Heights
City of Elk Grove
City of Folsom
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City of Sacramento
City of West Sacramento

Mary K. Snyder
District Engineer
Stan R. Dean
Plant Manager
Wendell H. Kido
District Manager
Marcia Maurer
Chief Financial Officer

December 27, 2007

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Ave., Suite 100-South
Sacramento, CA 95825

Dear Ms. Spurr:

Subject: Notice of Availability Draft Environmental Impact Report PG&E Line 108 Natural Gas Pipeline

Sacramento Regional County Sanitation District (SRCSD) has reviewed the subject document and has the following comments:

It is noted that PG&E is proposing to replace approximately 11 miles of a partially inactive natural gas transmission line, Line 108, which begins from just south of the Mokelumne River in San Joaquin County and ends just soutl of Elk Grove Boulevard in Sacramento County. The proposed pipeline diameter is 24-inches and will parallel PG&E's partially inactive 16-inch pipeline. C-1

The proposed project has no significant impacts with SRCSD facilities at this time.

If you have any questions regarding this letter, please feel free to contact me at (916) 876-5608 or by e-mail at obonel@saccounty.net.

Sincerely,

Elizabeth Obon
Assistant Engineer
Sacramento Regional County Sanitation District

EO:eo (eo)

cc: SRCSD Development Services
CSD-1 Development Services

Sacramento Regional County Sanitation District

2

RESPONSE TO COMMENT SET C

C-1 Comment acknowledged.

1 **COMMENT SET D**

12/28/2007

To: Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento Ca 95825

From: Robert Abercrombie
Reclamation District 1002
962 Lambert Road
Courtland Ca. 95615

Subject: CSLC EIR #737
PG&E Line 108 Natural Gas Pipeline.

Dear Project Manger,

Reclamation District 1002 is concerned with the construction of the 24" gas pipeline on both east and west of the UPRR tracks where it borders and enters our District. These are very sensitive areas as we saw last year with high surface water on the east side of the tracks east of Franklin Road. In the "Notice of Preparation A Draft Environmental Impact Report" section 2.2 Utilities and Service Systems paragraph it does not adequately address our concerns of seepage. This could fall into section 2.3 Special Impact Areas which is blank. We experienced some seepage which was visually evident through the railroad tracks last winter in 2005 and 2006. The possibility of this seepage increasing from the construction of a trench on the east and west side of the tracks north and south of Twin Cities Road is very possible. The increased expense for the landowners in District 1002 to pump off the seepage during high water years could be extremely costly. We propose that steps be taken to mitigate any extra seepage. Compaction tests should be used when backfilling the trench and if any parent material is not appropriate to backfill with, new material should be used to insure that the seepage will be minimized. D-1

It is difficult to anticipate all of what will happen in the event of a high water year and we would appreciate your attention to our concerns.

Respectfully,
Robert Abercrombie

cc: Jeff McCormack

cc: Tom McCormack

cc: Hal Huffsmith

cc. Lana Mirko

2

RESPONSE TO COMMENT SET D

D-1 An analysis of the proposed Project seepage is addressed in the Draft EIR in Section 4.3, Geology, Soils, Paleontology, and Mineral Resources, on page 4.3-23. That analysis includes construction techniques as part of the proposed Project which would be used to avoid creating a conduit for seepage. In addition, Section 2.3.2 of the Draft EIR notes that trench barriers or breakers would be installed before backfilling at specified intervals to prevent water movement along the pipeline. The trench would be backfilled using select excavated subsoils, and a moderate level of compaction, 85 percent of maximum density using the American Society for Testing and Materials (ASTM) D-1557 test procedure, would be used to reduce the risk of uplift and to minimize the potential for seepage.

1 **COMMENT SET E**

Cosumnes River Preserve
13501 Franklin Boulevard
Galt, California 95632
916.684.2816 telephone
916.683.1702 facsimile
info@cosumnes.org
www.cosumnes.org

January 10, 2008

California State Lands Commission
Attn: Crystal Spurr
100 Howe Ave., Ste. 100 South
Sacramento, CA 95825

Re: PG&E Line 108 Natural Gas Pipeline Draft Environmental Impact Report

Dear Ms. Spurr:

On behalf of the implementing partners at the Cosumnes River Preserve, the U.S. Bureau of Land Management (BLM), The Nature Conservancy, Ducks Unlimited, Sacramento County Regional Parks, and the Galt Joint Union School District would like to submit the following comments on the PG&E Line 108 natural gas pipeline Draft EIR. We would sincerely appreciate your review and consideration of our concerns prior to completion of a final EIR for this project.

As you are aware, the Cosumnes River Preserve is a 46,000-acre preserve owned and administered by a cooperative partnership involving seven land-owning agencies and organizations, including the California State Lands Commission. The BLM and The Nature Conservancy are the two primary implementing partners at the Preserve. A portion of the new PG&E Line 108 pipeline will be installed beneath the Cosumnes River with over one mile of the pipeline traversing a core part of the Preserve owned by the BLM and The Nature Conservancy.

Prior to the preparation of this Draft EIR, the BLM and The Nature Conservancy negotiated with PG&E to have the existing pipe bridge across the Cosumnes River removed as part of their proposed project. Our primary concern is that this Draft EIR proposes an environmentally superior alternative that recommends that the PG&E pipe bridge not be removed because of its potential historic value. A secondary, overarching concern with the Draft EIR is any determination that a new 24-inch pipeline will not facilitate additional urban growth over its 50-year design life.

E-1

Pipe Bridge

We understand the need to protect cultural resources and we do not disagree with your determination that the bridge may qualify, under the current guidelines, as a historic structure.

Partners
Bureau of Land Management • Ducks Unlimited • California Department of Fish and Game • California Department of Water Resources
Wildlife Conservation Board • Sacramento County Regional Parks • The Nature Conservancy • California State Lands Commission •
Natural Resources Conservation Service • Galt Joint Union Elementary School District

2

However, as we have discussed, and as the Draft EIR partially acknowledges, PG&E's pipe bridge poses a significant health and safety risk to not only Preserve visitors, but to the general public recreating on the Cosumnes River.

Appendix E in the Draft EIR acknowledges that the bridge has been painted with lead-based paint. While lead-based paint hazards are a serious concern to the Preserve, our primary concern is focused more on the fact that PG&E does not maintain the bridge. As such, the bridge is subject to eventual failure and collapse, which may result in the death or injury of Preserve visitors or the general public using the river. You may recall during your recent site visit that one of the upstream stabilizing cables has already snapped and one of the support towers for the old pipe has already toppled on the south side of the river. According to your engineer (C. Basavalinganadoddi) the stabilizing cables were probably not part of the original design and they were likely installed later to keep the bridge from swaying during high winds and/or flooding events.

As you may be aware, the Cosumnes River is the only major river flowing out of the Sierra Nevada mountain range that remains undammed for flood control and/or water storage purposes. As such, the river and the Preserve are continually inundated with flood waters during the winter and spring. Events as little as 1,500 cfs (measured at Michigan bar) can cause substantial flooding in the lower floodplain. As the river levels rise, the bridge presents an additional hazard when the remaining, intact stabilizing cables go under water. The submerged cables then pose a risk to navigation, especially to duck hunters and others that navigate the river during flooding events to access upstream and off-stream areas.

As also discussed, we are concerned that the bridge is an attractive nuisance for young adults and others that use it as a diving platform into the river. Employees at the Preserve have witnessed people jumping from the pipe bridge as well as from the railroad bridge. Given the frequent flooding nature of the Cosumnes River, diving from the bridge is extremely hazardous due to the large quantities of debris in the riverbed, debris that is an invisible underwater obstacle to anyone that dives off the bridge. While there is no official public access to the bridge via the Preserve trail system, illegal access occurs frequently and the Preserve partners are concerned about the potential liability issues associated with death or injury of people jumping off the bridge. For all these reasons we feel that the bridge must be removed.

E-1

Growth Inducing Potential

We strongly disagree with any conclusion that the new PG&E Line 108 will not facilitate population growth and urban expansion. We would argue that anytime a 16-inch, partially inactive gas line is replaced with a 24-inch, fully active gas pipeline, routed directly to one of the fastest growing areas in the United States, that cumulative long-term negative effects from additional urban growth will occur. In fact, the first page of the Executive Summary in the Draft EIR states that PG&E has identified objectives and purposes of the project that include serving new customers, creating a capacity to service future industrial customers, and increasing capacity to transport gas to other high-growth areas. In light of the stated objectives and purposes of the project, we are concerned that the Draft EIR does not clearly state that this gas line will support future urban development. Overall, we are of the opinion that the Draft EIR skirts the issue by saying things like the proposed project does not include the installation of lateral lines to serve new areas. In fact, the installation of new lateral lines is just a matter of time and it is completely interrelated with and interdependent on the installation of the new 24-inch gas line. As such, there will most definitely be future urban growth due, in part, to the installation of the 24-inch

E-2

1

E-2

PG&E Line 108 gas pipeline and the Final EIR should state this fact clearly so that appropriate actions can be taken to mitigate for the environmental impact.

Thank you for taking the time to consider our concerns. We appreciate any support that you could show to address our concerns as you and others move forward with the decision-making process. If you have questions or comments regarding this letter, please feel free to contact me at (916) 683-1701 or at Harry_McQuillen@ca.blm.gov

Sincerely,

Harry L. McQuillen
Preserve Manager
U.S. Bureau of Land Management

Mike Conner
Project Director, Real Estate Central Valley & Mountains
The Nature Conservancy

Rudolph A. Rosen
Director
Ducks Unlimited, Inc.

for Jill Ritzman
Deputy Director
Sacramento County Regional Parks

John J. Durand
Environmental Education Coordinator
Galt Joint Union Elementary School District

1

RESPONSE TO COMMENT SET E

E-1 The proposed Project currently provides for the removal of the pipeline bridge. Based on the environmental analysis, the bridge was found to meet the eligibility requirements for listing on the National Register of Historic Places, and thus considered an historic resource for the purposes of the CEQA. The Draft EIR provides that the removal of the bridge would be a significant unavoidable (Class I) impact and that feasible mitigation would not reduce the impact to less than significant. Section 15126.6(a), State CEQA Guidelines provides: “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project . . .” The “Project without Bridge Removal” alternative analyzed in the Draft EIR attains the basic objectives of the proposed Project but lessens the significant unavoidable impact of removing the bridge as a historic resource.

Section 15126.6(e)(2), State CEQA Guidelines also provides: “If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As the Draft EIR provides, the No Project alternative was identified as the environmentally superior alternative, therefore an environmentally superior alternative is required to be identified among the other alternatives. The “Project without Bridge Removal” alternative was identified as the environmentally superior alternative among the other alternatives because it would avoid a Class I impact and would not create any new or worsened impacts compared to the proposed Project.

Consideration of removing the bridge will need to take into account the historic significance of the bridge as well as the health and safety risks the bridge currently poses by leaving it in place.

E-2 Section 5.4 of the Draft EIR cites the appropriate State CEQA Guidelines on growth-inducing impacts of the proposed Project. Six criteria were used as a guide in evaluating the growth-inducing potential of the proposed Project. As a result of this evaluation, it was determined that there would be no direct or indirect growth-inducing impacts in the surrounding environment. The project objectives would provide service to new customers, increase the level of service reliability to current gas customers, increase capacity in order to transport gas to high growth areas, create a greater pipeline system capacity to serve expected future industrial customers, and increase operational flexibility. As the Draft EIR provides, these objectives are not providing a new source of gas, but serving existing customers or new costumers in newly or expected developed areas. As the Draft EIR states, “the demand for natural gas is a result of, not a precursor to, development in the region.”

1 **COMMENT SET F**

SRCSD

Wastewater Treatment

Technology in balance with nature

10545 Armstrong Avenue
Mather, CA 95655
Tele: [916] 876-6000
Fax: [916] 876-6160
Website: www.srcsd.com

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Stan R. Dean
Plant Manager
Wendell H. Kido
District Manager
Marcia Maurer
Chief Financial Officer

January 9, 2008

Ms. Crystal Spurr
Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Dear Ms. Spurr:

Subject: Notice of Availability / Public Hearings Draft Environmental Impact Report for PG&E Line 108 Natural Gas Pipeline

Sacramento Regional County Sanitation District and Sacramento Area Sewer District (formerly CSD-1) have reviewed the Notice of Availability of the Draft EIR for the PG&E Line 108 and have the following comments:

Construction for Sacramento Area Sewer District's Walnut Grove Sewer Project is currently scheduled to begin in May 2008 and end January 2009. Portions of the PG&E alignment south of Desmond Road are adjacent to this new Walnut Grove pipeline. Project coordination between PG&E and Sacramento Area Sewer District will be required if the gas line replacement is to occur during the same timeframe as the Walnut Grove sewer installation. F-1

If you have any questions regarding these comments please contact me at (916) 876-9994.

Sincerely,

Sarenna Deeble
Policy and Planning

cc: Michael Meyer
Ruben Robles
My Huynh
Amber Parmer
SRCSD Development Services
SASD Development Services

Printed on Recycled Paper

Sacramento Regional County Sanitation District

2

RESPONSE TO COMMENT SET F

F-1 Comment acknowledged. PG&E has made contact with the Sacramento Regional County Sanitation District (SRCSD) and would continue to coordinate with SRCSD to ensure that construction activities associated with the projects do not conflict with one another (PG&E, 2008).

Pacific Gas and Electric Company (PG&E). 2008. Personal communication with Mike Gunby, PG&E Project Manager, January 28, 2008.

1 **COMMENT SET G**

California Regional Water Quality Control Board
Central Valley Region
Karl E. Longley, ScD, P.E., Chair

Linda S. Adams
Secretary for Environmental Protection

Sacramento Main Office
11020 Sun Center Drive, #200, Rancho Cordova, California 95670-6114
Phone: (916) 464-3291 - FAX: (916)-464-4780
www.waterboards.ca.gov/centralvalley

Arnold Schwarzenegger
Governor

10 January 2008

Ms. Crystal Spurr
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT, PG&E LINE 108 NATURAL GAS PIPELINE, SACRAMENTO COUNTY (SCH # 2006102033)

I have reviewed the Draft Environmental Impact Report (DEIR) for the PG&E Line 108 Natural Gas Pipeline Project. We understand that the project consists of installing approximately 11 miles of 24-inch pipeline to replace the existing Line 108 natural gas transmission line in southern Sacramento County. The pipeline would be installed using a combination of open trench and trenchless technologies (horizontal directional drill and hammer bore). Horizontal directional drilling, which utilizes bentonite drilling mud, would be used to tunnel under surface water drainage features, levees, and wetlands. Hammer boring generates spoils that must be removed from the pipeline by water flushing or other means. Both trenchless methods require an operations pit at each end of the pipeline segment. Dewatering is expected to be minimal, and the applicant proposes to discharge any extracted groundwater as well as pipeline hydrostatic test water to either the Mokelumne River or the Cosumnes River Preserve under Central Valley Regional Water Quality Control Board Order No. 5-00-175, the General NPDES Permit for Low Threat Discharges to Surface Waters.

The DEIR is generally thorough and we note that the applicant has developed several "Applicant Proposed Mitigations", or APMs, that have been incorporated into the project. The applicant appears to have correctly identified the required water-quality related permits, such as storm water permits, Clean Water Act Section 404 Permits, and Streambed Alteration Agreements. Compliance with these permits and implementation of the APMs should be adequate to protect water quality. G-1

Regional Water Board staff offers the following comments, which we trust will be addressed in the Final EIR.

1. Finding No. 18 of Regional Water Board Order No. 5-00-175 states: *"The Water Quality Control Plans encourage the disposal of wastewater on land where practicable, and require applicants for discharge permits to evaluate land disposal as a first alternative. Where studies show that year-round land disposal is not practicable, the Discharger must evaluate, and utilize if feasible, dry season land disposal as an alternative."* G-2

   In keeping with the Basin Plan, we expect that all dischargers will use their best efforts to secure land disposal to the maximum practical extent. Therefore, it is not prudent to

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Ms. Crystal Spurr - 2 - 10 January 2008
California State Lands Commission

assume that all of the wastewater generated by the proposed project can be discharged to surface waters under Order No. 5-00-175. We recommend that the FEIR consider land disposal options, which are discussed further below. G-2

2. Order No. 5-00-175 contains effluent limitations for solids as follows: G-3

"1. Effluent shall not exceed the following limits:

Constituents	*Units*	*Monthly Average*	*Weekly Average*	*Daily Maximum*
BOD[1]	*mg/l*	*10*	*15*	*30*
Total Suspended Solids	*mg/l*	*10*	*15*	*30*
Settleable Solids	*ml/l*	*0.1*		

[1] 5-day, 20°C biochemical oxygen demand (BOD)"

The FEIR should include an evaluation of whether the discharges could comply with these limitations without treatment and, if not, what treatment methods will be used to ensure continuous compliance.

3. Likewise, Order No. 5-00-175 contains receiving water limitations that limits turbidity increases in the receiving water as follows: G-4

"The discharge shall not cause the following in the receiving water:
...6. The turbidity to increase as follows:
a. More than 1 Nephelometric Turbidity Units (NTUs) where natural turbidity is between 0 and 5 NTUs.
b. More than 20 percent where natural turbidity is between 5 and 50 NTUs.
c. More than 10 NTUs where natural turbidity is between 50 and 100 NTUs.
d. More than 10 percent where natural turbidity is greater than 100 NTUs."

The FEIR should include an evaluation of whether the discharges could comply with these limitations without treatment and, if not, what treatment methods will be used to ensure continuous compliance.

4. Discharge to land of water-flushed spoils from hammer boring and drilling mud from horizontal directional drilling requires either Waste Discharge Requirements (WDRs) or a waiver of WDRs from the Regional Water Board. The Regional Water Board has adopted a General Waiver for such discharges (Resolution No. R5-2003-0008). Coverage under the General Waiver is relatively simple to obtain. A copy of the General Waiver is available on the Regional water Board's web site at: G-5

http://www.waterboards.ca.gov/centralvalley/adopted_orders/index.html#Waivers .

If one or more of the discharges will not qualify for coverage under the General Waiver, staff can prepare WDRs or an individual waiver for the Regional Water Board's consideration. Although the General Waiver expired this month, staff plans to ask that the Regional Water Board reauthorize it in mid-2008.

5. Discharges from trench or pit dewatering and pipeline pressure testing can also be covered under Resolution No. R5-2003-0008. As noted above, land discharge is the preferred G-6

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Ms. Crystal Spurr - 3 - 10 January 2008
California State Lands Commission

G-6

method of waste disposal to the maximum extent feasible. The FEIR should evaluate the extent to which land disposal could be used.

If you have any questions about Order No. 5-00-175, please call Michael Negrete at (916) 464-4662. Contact me at (916) 464-4740 if you have any questions about land discharge options.

Anne Olson

ANNE L. OLSON, P.E.
Water Resources Control Engineer

cc: State Clearinghouse, Sacramento
Michael Negrete, CVRWQCB, Sacramento
Richard Muhl, CVRWQCB, Sacramento

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RESPONSE TO COMMENT SET G

G-1 Comment acknowledged.

G-2 Comment regarding Finding No. 18 of the Central Valley Regional Water Quality Control Board (CVRWQCB) Order No. 5-00-175 is acknowledged. PG&E's obligation to comply or be consistent with this finding is implicit in the terms and requirements of CVRWQCB Order No. 5-00-175. As such, PG&E will secure land disposal of all construction- and pipeline testing-related discharge to the maximum extent practical.

The Draft EIR does not assume that all of the wastewater generated by the proposed project would be discharged to surface waters. The Draft EIR (page 4.4-17) states that, "Due to the need for dewatering and the discharge of hydrostatic test water, the proposed Project would require the discharge of water to the local land surface, local waterways, the Cosumnes River, and/or the Mokelumne River." CVRWQCB Order No. 5-00-175 covers the following types of discharges relevant to the proposed Project: construction dewatering, pipeline pressure testing, and pipeline flushing or dewatering. Therefore, though land disposal will be secured where practical, the discharges described (whether discharged to the land surface or surface waters) would be covered by CVRWQCB Order No. 5-00-175 and would adhere to the findings, terms, and requirements described in the order.

G-3 An evaluation of whether future dewatering and pipeline testing and flushing discharges could comply with the requirements of CVRWQCB Order No. 5-00-175 would be speculative, as the quality of discharge water during the construction process is undeterminable at this time. However, it is widely known that such discharges from similar types of construction activities have met the discharge requirements, so it is reasonable to assume that the discharges from the proposed Project would also be able to meet the requirements of CVRWQCB Order No. 5-00-175. Regardless, PG&E would comply with all requirements of CVRWQCB Order No. 5-00-175 and, as stated in the terms of the order/permit, would immediately stop any discharge in the event there is a violation (or threat of a violation) of the permit or if the CVRWQCB so orders.

G-4 See Response G-3.

G-5 A portion of the text in the Draft EIR has been revised to clarify that, with respect to the discharge of spoils and/or drilling mud, PG&E would obtain Waste Discharge Requirements (WDRs) or a waiver of WDRs from the CVRWQCB. Pages 4.4-11, 4.4-12, 4.4-17, 4.4-18, 4.4-19, 4.4-20, and 4.4-21 of the Draft EIR have been revised. Refer to Section 4.0 of this Final EIR for revisions to the Draft EIR.

G-6 Refer to Response G-2 regarding land disposal. A portion of the text in the Draft EIR has been revised to clarify that PG&E, at the discretion of the CVRWQCB, would obtain a waiver for the construction-related discharges (see Response G-5). Otherwise, discharges from dewatering activities and pipeline pressure testing would be covered under CVRWQCB Order No. 5-00-175. Pages 4.4-11, 4.4-12, 4.4-17, 4.4-18, 4.4-19,

4.4-20, and 4.4-21 of the Draft EIR have been revised, Refer to Section 4.0 of this Final EIR for revisions to the Draft EIR.

COMMENT SET H

Pacific Gas and Electric Company

2730 Gateway Oaks Drive
Suite 220
Sacramento, CA 95833

January 14, 2008

VIA ELECTRONIC MAIL AND HAND DELIVERY

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Ave., Suite 100-South
Sacramento, CA 95825

Re: CSLC EIR No. 737; PG&E Line 108 Natural Gas Pipeline

Dear Ms. Spurr:

Pacific Gas and Electric Company ("PG&E") submits the following comments on the Draft Environmental Impact Report ("DEIR") prepared by the California State Lands Commission ("CSLC") for PG&E's proposed Line 108 Replacement Project ("Line 108" or "Project").

I. PROJECT DESCRIPTION

A. Clarifications to Project Description

PG&E would like to make some clarifications to the project description in Chapter 2 as discussed below.

First, the DEIR notes that PG&E has proposed that, "[w]ithin the Cosumnes River Preserve the proposed pipeline would be installed in the existing 15-foot easement, approximately 6 feet east of the existing deactivated 16-inch line (Figure 2.1-3)." (DEIR, p. 2-8). PG&E would like to clarify that, in order for the replacement pipeline to be installed within PG&E's existing 15-foot easement, it may be necessary to extract minor segments of the existing inactive line. PG&E requests that the text on page 2-8, lines 2 to 4 be clarified as follows: "Within the Cosumnes River Preserve the proposed pipeline would be installed in the existing 15-foot easement. Where possible, the new line would be installed approximately 6 feet east of the existing deactivated 16-inch line, and where necessary, portions of the deactivated 16-inch pipeline in this area may be removed in accordance with law to accommodate the new line." H-1

Second, also on page 2-8, within the description of a portion of the new line on either side of Twin Cities Road, the project description should be clarified to allow for potential use of Franklin Boulevard for construction staging and/or relocation of a portion of the new pipeline into the franchise in Franklin Boulevard in the event that PG&E is not able to secure sufficient easements. This contingency is entirely within the study area and depicted on the attached revised figures A and B (showing portions of what is shown on Figures 2.1-3 and 2.1-4). Impacts to the road are addressed in the Traffic and Transportation section, and such use of Franklin Boulevard would be subject to Mitigation Measure TRA-1, which requires the submission of traffic control plans for review and approval. Specifically, on page 2-8, line 7, the H-2

Crystal Spurr, Project Manager
January 14, 2008
Page 2

following sentence should be added to the end of the paragraph: "If sufficient easements in this section are not obtained, an approximately 20-foot wide area adjacent to the outside easement edge of Franklin Boulevard could be used for construction staging or, if necessary, the pipeline could be trenched in public franchise within Franklin Boulevard for approximately 2,500 feet to Twin Cities Road." On page 2-8, line 25, the following sentence should be added to the end of the paragraph: "If sufficient easements in this section are not obtained, an approximately 20-foot wide area adjacent to the outside easement edge of Franklin Boulevard could be used for construction staging or, if necessary, the pipeline would be trenched in public franchise within Franklin Boulevard for approximately 2,600 feet from Twin Cities Road to approximately 500 feet south of Dierson Road."

H-2

Third, the DEIR notes that, "[t]he easements would be purchased from the existing landowners, who would also be compensated for PG&E's use of temporary use areas during construction." (DEIR, p. 2-21, lines 20-22). After that sentence, the following clarification should be added: "If, in the event sufficient temporary easement area is not obtained, temporary construction staging may occur in Franklin Boulevard from about 2,500 feet south of Twin Cities Road to about 500 feet south of Dierson Road, from about 5900 feet south of Lambert Road to about 200 feet north of Lambert, from about 800 feet north of Lambert Road to about 1200 feet north of Lambert Road and from about 2500 feet north of Lambert Road to about 3200 feet north of Lambert Road. In such an event, so long as the work occurs within the 500 foot study area and is subject to the traffic and transportation mitigation required in this document, no new impacts would occur." Nevertheless, in such an event, PG&E would notify the CSLC.

H-3

Fourth, the DEIR notes that, within the Cosumnes River Preserve and north of the UPRR/Franklin Boulevard Intersection through the Stone Lakes National Wildlife Refuge, the proposed pipeline would be installed within PG&E's existing 15-foot permanent easement. (DEIR, p. 2-21). While this is generally correct, there is a small area requiring additional land rights to accommodate the HDD turning radius. Therefore, on page 2-21, line 27, the following text should be added to the end of the sentence, "with the exception of a small area where additional land rights will be needed to accommodate the radius of the HDD under the Lost Slough on the Cosumnes River Preserve."

H-4

Fifth, page 2-24 of the DEIR states that, "[t]he existing 16-inch pipeline would remain in place and would continue to provide limited distribution service in the area. No construction activities are required." Existing Line 108 is being utilized as a distribution pipeline to serve residences from Elk Grove Boulevard south to a point approximately 350 feet south of Dierson road. This portion of existing Line 108 will be left in service. There is sufficient right of way available along this portion of the route to accommodate the new line. South of Dierson road, however, the new pipeline must be installed in the existing 15-foot wide right of way to comply with conservation easements. Therefore, consistent with the first comment above, PG&E requests clarification that portions of the inactive Line 108 south of Dierson Road may require removal, in accordance with all applicable laws, to accommodate the new pipeline in the existing right of way. Specifically, PG&E requests that the text on page 2-24, lines 15-16 be revised as follows: "A portion of the 16-inch pipeline would remain in place and would provide limited

H-5

1

Crystal Spurr, Project Manager
January 14, 2008
Page 3

distribution service to residences from Elk Grove Boulevard to approximately 350 feet south of Dierson Road. The remainder of the 16-inch pipeline will be abandoned. Where possible, new pipeline will be constructed adjacent to the abandoned pipeline. Where necessary, portions of the deactivated 16-inch pipeline in this area may be removed in accordance with law to accommodate the new line. No additional trenching will be required." H-5

B. Clarification to Post Construction Activities

The DEIR states, "All construction material and debris would be removed and disposed of at appropriate landfills." (DEIR, p. 2-43). Because landfill disposal is not necessarily required for trenched spoil and HDD mud, PG&E requests that this language be modified to state, "All construction material and debris will be disposed of appropriately, or with respect to trench spoils and HDD mud, reused with landowner and agency approvals." H-6

II. ALTERNATIVES AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE DETERMINATION

A. The Project With Bridge Removal Is The Environmentally Superior Alternative

PG&E proposed, at the request of the Bureau of Land Management ("BLM"), to include as part of the proposed Project the removal of an approximately 630-foot long suspension bridge that crosses the Cosumnes River. (DEIR, p. 2-19). The bridge was likely constructed in the 1930s or 1940s and originally supported the Line 108 pipeline across the river.

As an alternative to the proposed Project, the CSLC considered the Project without Bridge Removal Alternative, which would result in construction of the proposed Project but would leave the suspension bridge intact. (DEIR, p. 3-14). The CSLC concluded that, "[b]ecause the Project without Bridge Removal Alternative would eliminate a Class 1 impact and would not create any new or worsened impacts compared to the proposed Project, the Project without Bridge Removal Alternative is selected as the environmentally superior alternative." (DEIR, p. ES-20).

This conclusion is flawed because first, it wrongly concludes that the bridge is a historical resource under CEQA (*see* comments at Section III.F, below), and second, because it assumes no impacts from leaving the bridge in place. However, there are significant impacts resulting from leaving the bridge in place, including adverse effects to health and safety, recreation, biology and water quality based on reports of people jumping from the bridge into the Cosumnes River, impaired clearance for kayakers and canoeists beneath the bridge, unintended access to The Nature Conservancy ("TNC") property between the rivers and lead paint on the bridge. In addition, removal of the bridge would benefit land use policies and improve aesthetics, as the area is managed by the BLM as an open space, nature area, and removal would allow the area to fully meet that designation and restore it to its natural condition. TNC and the BLM intend to submit more data on these issues to the CSLC. PG&E believes that when all the impacts associated with leaving the bridge in place are considered, the proposed Project is the H-7

1

Crystal Spurr, Project Manager
January 14, 2008
Page 4

environmentally preferred alternative, and a statement of overriding considerations for removing the bridge is warranted in order to protect human health, human safety and the environment. H-7

B. Clarification to Project without Bridge Removal Alternative

PG&E proposed that, in addition to removal of the bridge, PG&E would remove the north anchor block and north pier to a level one foot below the natural ground and backfill to the surface. (DEIR, p. 2-19). PG&E clarifies that, after consultation and at the request of TNC, PG&E proposes to remove only the pier block on the north side of the Cosumnes River. The anchor block on the north side will remain in place to protect the plants in the area. Therefore, on page 2-19, the sentence on lines 26 to 28 should be replaced with the following sentence: "In addition to removal of the bridge span, PG&E will remove the north pier, but will leave the north anchor block in place." H-8

III. ENVIRONMENTAL ANALYSIS

A. Biological Resources

1. Mitigation for Impact BIO-1 (Vernal Pools)

PG&E agrees with the application of Best Management Practices ("BMPs") proposed in the DEIR. However, in the third bullet under the Mitigation Measure BIO-1, the DEIR specifies that vegetative application shall be completed by September 15 and that, if grass is chosen, a native seed mix shall be used. (DEIR, p. 4.1-66). As the project may not be completed by September 15, PG&E requests that vegetative application be completed no later than November 30. Furthermore, native seed may not always be the desired vegetation of the landowner and the seed application should occur after the first rain of the season. Therefore, on page 4.1-66 at lines 12-13, PG&E requests that this mitigation requirement be changed to state that "vegetative application will be completed by November 30. Where grass is selected, PG&E will use a native seed mix, unless otherwise specified by landowner." H-9

2. Impact BIO-3 and MM BIO-3 (California Tiger Salamander)

The DEIR states that California tiger salamanders have a "medium" potential for occurrence (DEIR, p. 4.1-21) and that, "[i]n the study area, vernal pool habitat may provide suitable breeding habitat for tiger salamander; however, there are no known populations of California tiger salamanders in the immediate vicinity of the study area (CDFG 2007)." (DEIR, p. 4.1-36). The DEIR then concludes that there is a potential for a significant impact to California tiger salamanders. (DEIR, p. ES-4, and p. 4.1-68.) Mitigation Measure BIO-3 at DEIR pp. 4.1-68 to 4.1-69, which requires a "protocol" level survey two weeks prior to construction, is intended to mitigate this alleged impact. H-10

PG&E does not agree with the conclusion that Line 108 may result in potentially significant impacts to California tiger salamanders in the absence of mitigation. The only vernal pool habitat in the project area is in the Stone Lakes National Wildlife Refuge. These features do

1

Crystal Spurr, Project Manager
January 14, 2008
Page 5

not remain inundated long enough to support California tiger salamanders. The project area does not support suitable habitat and this species is not present in this portion of Sacramento County. The closest recorded occurrence is over 6 miles away. This occurrence was from the early 1900s and is believed to be extirpated.

The United States Fish & Wildlife Service (USFWS) concurs in this assessment. The USFWS did not include California tiger salamander in its list of species of concern relative to this Project. *See* letter dated September 21, 2007 from Peter Cross, USFWS, to Andrea Jones, U.S. Army Corps of Engineers (USACOE), attached. Furthermore, Mitigation Measure BIO-3 is infeasible, because there would be insufficient time to conduct protocol level surveys two weeks prior to construction. Protocol level surveys initially require a habitat assessment that includes an analysis of whether the project site is within the range of the species and if recorded occurrences have been documented within 3.1 miles of the project. Following the habitat assessment, aquatic sampling during two breeding seasons and a drift fence study in the intervening winter is required. There have been no documented occurrences within 3.1 miles of the project, and it is patently infeasible to perform a two-year protocol level survey within the two-week period contemplated by the DEIR. H-10

Nonetheless, to the extent that the USFWS determines that there are impacts to California tiger salamander habitat, PG&E will comply with the Biological Opinion ("BO") issued by the USFWS.

As there is neither suitable habitat nor any California tiger salamander occurrences in the study area, PG&E requests that: (1) the potential for occurrence of California tiger salamander on page 4.1-21 be changed from "Medium" to "Unlikely"; (2) the sentence on page 4.1-36 line 4-5 be replaced with "In the study area, vernal pool habitat does not provide suitable breeding habitat"; (3) Impact BIO-3 and MM BIO-3 at pages 4.1-68 and 4.1-69 be deleted; (4) MM BIO-3 be deleted from the Executive Summary at page ES-9, and the Mitigation Monitoring Program at page 6-6; (5) the California Tiger Salamander Survey Protocol be deleted from MMP Attachment 1 at pages 6-11; and (6) the reference to California tiger salamanders on line 5 of page ES-4 be deleted.

3. APM BIO-1 (SWPPP Requirements)

Applicant Proposed Measure BIO-1 requires a Worker Environmental Awareness Program. Among other things, it states, "The program shall also cover all mitigation measures, environmental permits and proposed Project plans, such as the Stormwater Pollution Prevention Plan (SWPPP), best management practices (BMPs), erosion control and sediment plan, and any other required plans." (DEIR, p. 4.1-56). PG&E requests that all references to SWPPPs be deleted, as gas transmission lines are exempt from SWPPP permit requirements. 40 C.F.R. Section 122.26(a)(2)(ii). Nonetheless, PG&E will follow BMPs for stormwater pollution and erosion control prevention. BMPs are identified in the PG&E Water Quality Construction Best Management Practices manual. H-11

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Crystal Spurr, Project Manager
January 14, 2008
Page 6

4. APM BIO-8 (Elderberry Shrubs Avoidance)

Applicant Proposed Measure BIO-8 requires PG&E to "avoid elderberry shrubs by maintaining a minimum 100-foot buffer around any elderberry shrubs. Any ground disturbing activities within 100 feet of elderberry shrubs with stems measuring 1.0 inch or greater in diameter at ground level shall require consultation with the USFWS and follow the USFWS Conservation Guidelines for the Valley Elderberry Longhorn Beetle (USFWS 1999)." (DEIR, p. 4.1-61). Because PG&E is obtaining a Biological Opinion from the USFWS with respect to this project and to avoid potential conflicts between the Biological Opinion and the Guidelines, the last sentence on page 4.1-61 lines 28-32 should be revised to state "Any ground disturbing activities within 100 feet of elderberry shrubs with stems measuring 1.0 inch or greater in diameter at ground level shall require consultation with the USFWS and follow the USFWS Biological Opinion requirements for this project." H-12

B. Geology, Soils, Paleontology and Mineral Resources

1. APM GEO-3 (Drilling Program: Scour and Certified Hydrogeologist)

PG&E proposed in the second bullet point to its Applicant Proposed Measure GEO-3 that it would "hire a State certified hydrogeologist to conduct a scour analysis and report of the pipeline crossing at the Cosumnes and Mokelumne Rivers." (DEIR, p.4.3-15). PG&E notes that the certification for a state hydrogeologist does not exist. Therefore, PG&E will hire a Civil Professional Engineer to perform the scour analysis. PG&E requests that this clarification be made in line 2 of page 4.3-15. H-13

C. Hydrology and Water Quality

1. SWPPP

As noted above, gas transmission lines are exempt from the requirement of an SWPPP permit. Therefore, pages 4.4-11, 4.4-12, 4.4-14, 4.4-17 and 4.4-18 should remove any reference to the requirement to obtain an SWPPP permit. However, as noted above, PG&E will adhere to the BMPs identified in the PG&E Water Quality Construction Best Management Practices manual. H-14

D. Hazards and Hazardous Materials

1. Impact HAZ-1: The CSLC's Conclusion that the Project Would Result in a Significant Unavoidable Risk of Serious Injuries and Fatalities is Flawed

The CSLC conducted a probabilistic pipeline risk assessment for the proposed Project, and concluded that there is a 1:245,000 likelihood (or 4.08×10^{-6} risk) of the proposed Project causing a serious injury or fatality, resulting in a significant, unavoidable impact. (DEIR, p. 4.5-20). H-15

1

Crystal Spurr, Project Manager
January 14, 2008
Page 7

PG&E has reviewed the risk calculation and determined that many of the assumptions used in the calculations should be refined to accurately reflect the type of pipeline being proposed. By revising the probabilities commensurate with the proposed Project, the annual risk of serious injury or death is under the 1 in 1,000,000 threshold at 0.96×10^{-6}.

H-15

PG&E's analysis of the risk calculated in the DEIR has revealed several unsupportable assumptions that overstate the risk. The assumptions at issue include the calculation for the baseline of reportable releases, the conditional probability of a rupture resulting in ignition, and the distance of release exposure. These assumptions lead to a flawed probability of exposure analysis and incorrect calculation of the overall risk, as further discussed below.

a. Baseline Probability of Reportable Release

The number of baseline reportable releases used in the DEIR was determined by dividing the number of incidents reported to the Office of Pipeline Safety ("OPS") between 2002 and 2006, by the sum of the number of *transmission* pipeline miles reported by all operators in that period. The DEIR notes that there were 621 transmission and gathering incidents reported and 301,991 miles of transmission pipeline reported to the Department of Transportation ("DOT") during this five year period. Based on this information, the DEIR then concluded that the probability of reportable release is 621 incidents /(5 x 301,991 miles) = 4.11×10^{-4} reportable events per mile per year. However, this baseline risk is inaccurate, as the incidents included both transmission and gathering incidents and the pipeline miles included only transmission line. For this calculation, gathering lines should be excluded. Gathering lines operate under less stringent regulatory requirements than transmission lines and have additional threats. Including gathering line incidents in the calculation is inappropriate. Excluding gathering line events reduces the number of reportable incidents from 621 to 552. The miles of gathering lines were already excluded in the initial calculation. Therefore, the revised probability of release is 3.66×10^{-4}.

H-16

Note that the probability of release would be reduced further if the baseline calculation used only events on pipelines installed from 1990 forward, as earlier constructed pipelines are not subject to the same, stringent regulatory and updated engineering, and maintenance requirements as the line PG&E proposes to install and operate. There are approximately 45,082 miles of pipe installed after 1990, and only 61 events that occurred on these lines between 2002 and 2006; therefore, the probability of release is reduced to 61/225,410 or 2.7×10^{-4}. While this lower probability is not used in PG&E's risk calculation discussed here, it is provided to show that even PG&E's calculation is overly conservative.

b. Conditional Probability of Event

The DEIR assumes that the conditional probability of an event is 1.7%. This is incorrect. PG&E determined that the probability is 1.45%. The DEIR calculation is based on 23% of the incidents reported as ruptures. The DEIR assumes:

H-17

- 23% of all ruptures result in complete full diameter pipe severance;

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Crystal Spurr, Project Manager
January 14, 2008
Page 8

- 13% of the ruptures result in ignition; and
- 58% of these ignition events burn rather than explode.

H-17

Therefore, the DEIR calculates the conditional probability of event as equal to 0.23 x 0.13 x 0.58 = 0.017 (1.7%).

PG&E's analysis shows that only 10% of ruptures result in full diameter pipe severance. Between 2002 and 2006, 55 of the 552 ruptures were reported to the OPS for gas transmission lines resulting in Circumferential Separation (full diameter pipe severance). This constitutes 10% of the transmission incidents reported. Of these, 8 (or 14.5%) result in ignition. Therefore, the correct conditional probability of event is 1.45%.

c. Affected Pipeline Length for Probability of Exposure

The DEIR analysis determined the likelihood of injurious exposure by multiplying three factors: (1) the probability of release; (2) the length of roadway where a release could pose a hazard (6.2 miles); and (3) the number of cars traveling along the roadway at any one time (8.59).

H-18

The calculation for the probability of an injurious exposure in the DEIR is flawed because, in addition to the probability of release errors discussed above, it overstates the length of roadway posing a hazard. A car's occupants are only exposed to injury at the location of the pipeline failure. The length of roadway where a release poses a hazard is limited to the length traveled by a car during the event. The entire 6.2 miles will not rupture simultaneously, so the length utilized in the original calculation is excessive. Instead, the length should be calculated by length traveled by one car before it could stop and avoid entering the hazard area and then by the average number of cars traveling along the roadway at any one time.

Assuming that the DEIR is correct, it takes 1 second to drive through the area of danger during a fire. A car moving at 40 miles an hour would travel 59 feet in one second. The distance it takes to stop prior to reaching the fire is 164 feet (see attached web information on the stopping distance for a vehicle traveling 40 mph). To account for slower than average reaction times, or that larger vehicles might take longer to stop, PG&E assumed twice the average stopping distance, or 328 feet. The total length in which a release poses a hazard is (328ft+59ft)/5280 ft/mile or .073 miles per vehicle. Therefore, 0.073 miles rather than the full 6.2 miles of roadway is the appropriate mileage to consider when calculating risk for this scenario.

d. Results of PG&E's Analysis Using More Applicable Assumptions

H-19

Using the same model as the DEIR but with the factors noted above, the revised risk for this scenario is 3.21×10^{-7}. Adding this risk to the other numbers calculated in the DEIR results in an annual risk of serious injury or fatality to individuals of 0.96×10^{-6}. This risk is less than one in a million. The attached Table 4.5-1 shows PG&E's analysis, using the same model as the DEIR, but with more appropriate assumptions as described above.

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Crystal Spurr, Project Manager
January 14, 2008
Page 9

Even with the revised assumptions and analysis, PG&E believes that the risk of 0.96 x 10^{-6} is excessively conservative. The statistics used to calculate the probability of failure still overestimate the likelihood of a pipeline rupture. A pipeline operating at less than 30% of the Specified Minimum Yield Strength, as Line 108 will, is generally not at risk for rupture due to corrosion because of the excessive critical flaw size required to initiate rupture. In addition, modern pipelines have little probability of failure due to manufacturing or construction defects. H-19

In sum, the impact from risk of pipeline rupture is not significant, and the DEIR should be revised to delete that impact and the mitigation measures at pages 4.5-20 to 4.5-24. Similar revisions should be made in the Executive Summary at page ES-11 and ES-17, as well as in the Mitigation Monitoring Program at pages 6-7. While PG&E believes that Mitigation Measures HAZ-1a and HAZ-1b are not warranted based on the flawed finding of significance and should be deleted in their entirety, PG&E takes particular exception to the second and sixth bullet points of Mitigation Measure HAZ-1a, as discussed below.

2. MM HAZ-1a: Third Party Damage Mitigation Effectiveness - Supplemental Third Party Protection

The second bullet point of Mitigation Measure HAZ-1a requires a 6-inch wide marker tape approximately 12-18 inches below the ground surface over the pipeline as a third party protection measure. DEIR, p. 4.5-22, lines 1-5. However, PG&E requires that its personnel stand by during third party excavation around PG&E transmission pipelines. This maintenance standard provides a superior means to reduce damage by third parties, and there is no perceptible benefit from the installation of marking tape. Therefore, rather than the marker tape, PG&E recommends it provide enhanced safety through participation in Underground Service Alert (USA) and standby of PG&E personnel whenever excavation occurs within 5 feet of the pipeline as a more effective supplemental third party protection measure. Accordingly, if this MM HAZ-1a is not deleted, PG&E requests that the second bullet point on page 4.5-22, lines 1-5 be deleted and replaced with "PG&E shall participate in the Underground Service Alert (USA) and provide standby personnel whenever excavation occurs within 5 feet of the pipeline." H-20

3. MM HAZ-1a: Close Interval Survey and HCA Treatment

The sixth bullet point of Mitigation Measure HAZ-1a requires: "If the in-line inspection required by Mitigation Measure HAZ-1b is not implemented because the pipeline is operated below a hoop stress of 40 percent Specified Minimum Yield Strength, then a close interval cathodic protection survey shall be performed at least every seven years and shall comply with (a) the National Association of Corrosion Engineers (NACE) Recommended Practice RP0792 – Standard Format for Computerized Close Interval Survey Data and (b) NACE Recommended Practice RP0502 – Pipeline External Corrosion Direct Assessment ("EDCA") Methodology, or the entire portion of the pipeline within 200 feet of a roadway or structure shall be included in PG&E's Integrity Management Program." (DEIR, p. 4.5-22). PG&E believes that this mitigation measure is unnecessary given the low risk of pipeline upset discussed above. Therefore, PG&E proposes that this bullet point be deleted, or in the alternative, replaced with the following text: "PG&E will comply with 49 C.F.R. Part 192, SubPart O to determine which H-21

1

Crystal Spurr, Project Manager
January 14, 2008
Page 10

portions of L-108 should be included in PG&E's Integrity Management Program. For those portions identified as HCAs, inspections shall be performed every seven years. When ECDA is utilized to inspect the pipeline, PG&E's procedures will comply with NACE Recommended Practice RP0502. For the portions of the new Line 108 that are not in HCAs, PG&E will provide enhanced safety through participation in Underground Service Alert (USA) and standby of PG&E personnel whenever excavation occurs within 5 feet of the pipeline." H-21

E. Traffic and Transportation

1. Impact TRA-1 (Work in Public Roadways)

Under Impact TRA-1 on page 4.7-2 to 4.7-3 and 4.7-9, the potential impact to Franklin Boulevard should be updated to account for the minor potential construction impacts discussed in Section I. On page 4.7-3, the following sentence should be added to line 2: "Finally, construction (staging and/or trenching) in Franklin Boulevard could extend for up to12,300 feet." Likewise, on page 4.7-9, the sentence on lines 10 to 11, which states there will be approximately 3,600 feet of trenching in Franklin Boulevard, should be deleted and replaced with: "Up to 15,900 feet of construction activities may occur within Franklin Boulevard." H-22

2. MM TRA-2 (Private Property Access)

Mitigation Measure TRA-2 requires that access to all private roadways and driveways shall not be disrupted for more than four hours at a time. (DEIR, p. 4.7-10). While PG&E will generally comply with this requirement, PG&E requests that HDD pull-back and hydrostatic testing activities be exempted from this requirement, as they will require more than four hours to complete. The only affected locations are the pull-back location south of the Cosumnes River and two residents on old Franklin Boulevard, north of Bilby Road. Therefore, PG&E requests that the first sentence of MM TRA-2 at lines 27-28 of page 4.7-10 be revised to state: "With the exception of pull-back and hydrostatic testing locations, access to private roadways and driveways shall not be disrupted for more than four hours at a time." H-23

F. Cultural Resources

In addition to the information submitted by PG&E, BLM and TNC demonstrating that the Project with Bridge Removal should be the environmentally superior alternative, additional evidence uncovered by PG&E shows that the suspension bridge is not eligible for inclusion in the National Register of Historic Places ("NRHP") under Criterion C or Criterion D, and therefore is not a historical resource under CEQA. H-24

In order to meet Criterion C, the resource must embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction. (DEIR, p. 4.9-20). The Significance Evaluation in Appendix E based its eligibility finding under Criterion C on the statement that, "[a]t this time there are no other known suspension bridges that were constructed for PG&E natural gas pipelines (Caruso 2006).

1