

1 The low level of detail was selected to calculate fugitive dust emissions based on the
2 cut and fill assumptions contained in Appendix D-8 of this Revised Final EIR.

3 Per the methodology provided in Appendix D-8 of this Revised Final EIR, emissions
4 generated by most off-road construction equipment was hand-calculated using the
5 URBEMIS emission rates and load factors for the year of activity, and the known
6 equipment types, horsepower, and hours of use. The exceptions are for water
7 trucks and the Dunnigan Hills grading phase, which were calculated using
8 URBEMIS. URBEMIS was primarily used to calculate fugitive dust (hence the cut
9 and fill components), on-road hauling, and paving emissions. The emissions
10 generated by equipment that would conduct the cut and fill activities are contained in
11 Appendix D-8 of this Revised Final EIR. See comment O-14.

12 **O-14** The clarification for location of emissions outputs for construction of the
13 propose Project segments is provided below:

14

Construction Emissions Output Sources

Construction Activity	Calculation Methodology	Output Location (within Appendix D-8 of this Revised Final EIR)
Grading - Dunnigan Hills	URBEMIS	Appendix D-3, Line 406 Output.
Trenching - Environmental Crew	Hand Calculation	Appendix D-2
Trenching - 18 Day Crews	Hand Calculation	Appendix D-2
Trenching - Tie-In Crew	Hand Calculation	Appendix D-2
Trenching - Hydro Test Crew	Hand Calculation	Appendix D-2
Trenching - Clean Up Crew	Hand Calculation	Appendix D-2
Trenching - Remaining	URBEMIS	Appendix D-3, early August fine grading phase
Pipe Hauling	URBEMIS	Appendix D-3, late August fine grading phase
HDD - Off-Road Emissions	Hand Calculation	Appendix D-2
HDD - URBEMIS Output	URBEMIS	Appendix D-3, early August fine grading phase
Paving	URBEMIS	Appendix D-3, paving phase
Jack and Bore - Off-Road Emissions	Hand Calculation	Appendix D-2
Jack and Bore - URBEMIS Output	URBEMIS	Appendix D-3, mid-August fine grading phase.



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Comment Set P
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June 12, 2009

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

*Via E-mail spurrc@slc.ca.gov
and Regular Mail*

**Re: Pacific Gas & Electric Company (PG&E Line 406/407 Natural Gas Pipeline)
Comments on Draft Environmental Impact Report**

Dear Ms. Spurr:

Our firm represents the Placer Vineyards Development Group, LLC (“Owners Group”), which processed and obtained approval of the Placer Vineyards Specific Plan in Placer County (the “Placer Vineyards Specific Plan”). As you know, at the beginning of this year we provided comments on behalf of the Owners Group with respect to the initial study for the above described Line 406/407 Natural Gas Pipeline (the “Project”), raising concerns about the adequacy of the alternatives and the compatibility of the Project with the Placer Vineyards Specific Plan. We note that, as part of the Alternatives analysis in the Draft Environmental Report (“DEIR”) for the Project, Options I, J, K and L, were included to avoid, or substantially lessen, the land use conflicts and risks to safety presented by locating the Project adjacent to the approved high school and within 1,500 feet of one of the approved elementary school sites in the Placer Vineyards Specific Plan.

P-1

On behalf of the Owners Group, we are writing this letter to (i) again question the adequacy of the range of alternatives considered in the Alternatives analysis and, (ii) if no other alternatives are determined to be feasible, to support your determination that the Environmentally Superior Alternative to the Project, other than the No Project Alternative, is the Project with the incorporation of Options I and L. We further contend that incorporating Options I and L into the proposed Project would result not only in an Environmentally Superior Alternative, but also in a Project Superior Alternative that will better advance the purposes of this Project, and that the Project description should be revised to incorporate these Options so the environmental effects thereof can be fully addressed by the DEIR.

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Additional Alternatives to be Considered.

We note that the DEIR did not include any response to our prior comments regarding, or analysis of the potential feasibility of, modifying the Project to reduce the size and/or pressure of the line segments within Baseline Road adjacent to higher density urban developments. These additional alternatives should be addressed due to the potentially significant risk to health and safety caused by the Project as proposed, even with inclusion of all mitigation measures and mitigating Options. In Section 4.7 of the DEIR, the analysis of Impact HAZ-2 (starting on page 4.7-32), states that an unacceptable risk is defined as a one in a million chance of fatality from a natural gas leak or rupture. As noted in Table 4.7-5, the Project's overall risk of serious injury or fatality is estimated at approximately one in sixteen thousand (approximately 60 times greater than the accepted safety criteria); only the 10" DFM line reflects a safety risk that is less than the one in a million standard. And as noted on page 4.7-39, even after the proposed mitigation (to minimize corrosion and install shutdown valves) is incorporated into the Project, the residual risk of serious injury or fatality is only reduced to one in thirty thousand (approximately 33 times greater than accepted safety criteria). Given these significant risks to human health and safety, additional Alternatives that could reduce these potential impacts to acceptable levels must be seriously considered.

P-3

In particular, additional engineering alternatives may be available that could further reduce the risk of serious injury or fatality, such as thicker piping, or deeper installations, or protective outer casings with warning beacons to reduce the potential risk of damage or upset to the actual gas pipeline. These potential alternatives need to be considered, particularly near higher planned concentrations of people and activities, to effectively mitigate the potential impacts of this pipeline on the environment. While it may not be feasible to incorporate heightened design features for the full length of the pipeline, the increased benefit associated with incorporating additional safety features adjacent to higher density developments may justify the feasibility of these measures adjacent to the planned urban developments.

Similarly, pipeline designs should be considered that would allow the installation of smaller diameter pipelines within urban development areas. As noted in the DEIR, the 10" DFM pipeline is the only segment of the Project that is estimated to pose acceptable levels of risk of injury and fatalities. To avoid running a large, high pressure gas line adjacent to urban development that poses unacceptable and unmitigable levels of risk to safety, for the easternmost segment, a terminus for the high pressure portion of the Project located west of the Placer Vineyards Specific Plan should be considered, with smaller, low pressure pipelines installed from such terminus, through intervening developments, to the junction of Fiddymont and Baseline Roads. Such multiple lines could be installed as service lines throughout the area, as development occurs and service needs expand.

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For purposes of preserving compatibility with planned land uses and reducing risks to safety, as demonstrated by the DEIR's analysis of acceptable risk levels, high pressure gas lines should not be located within existing or planned high density, urban environments. The risk of upset and the risk of damage and death are increased by orders of magnitude as and where these high pressure gas lines are located adjacent to and within high density urban developments. Once a gas pipeline is being located within a planned urban environment, the size of the pipeline should be adjusted accordingly, if at all feasible, to reduce the risk of damage and harm. The higher density urban developments also provide greater opportunities to locate low pressure gas lines throughout the developing area, both for distribution and service purposes.

↑
P-4
Cont.

We note that one rejected alternative considered the feasibility of connecting smaller, low pressure gas pipelines throughout the entire Project within existing rights-of-way. Our request is to consider the feasibility of maintaining the high pressure line in the low density, agricultural areas, but locating multiple low pressure gas pipelines throughout the planned higher density, urban areas. The greater the density, the greater the concentration of people being exposed to the risks of upset and damage, including areas planned for even higher concentrations of people within commercial areas, schools, churches, and community centers.

P-5

To fully consider all feasible alternatives, including an alternative that could reduce the land use conflicts and risks to safety to less than significant levels, we respectfully request that the Alternatives Analysis include and address the feasibility of additional engineering alternatives that could incorporate improved safety features adjacent to planned urban areas and/or alternatives where networks of low pressure gas pipelines would be installed throughout planned higher density developments in place of the high pressure gas lines adjacent to approved urban density developments.

P-6

Environmentally Superior Alternative.

Subject to our above comments, assuming no additional engineering safety alternatives or low pressure network alternatives are feasible within the planned urban areas, we concur with your conclusion in the Environmentally Superior Alternative section of the Executive Summary that incorporating Alternative Options I and L into the proposed Project would result in an Environmentally Superior Alternative. (See page ES-32.) As noted in the DEIR, Option I is necessary in order to relocate the proposed gas pipeline at least 1,500 feet away from the high school planned in the Placer Vineyards Specific Plan. Although we appreciate that this Option I may involve some additional impacts to biological resources, we note that all of these additional biological impacts can be mitigated to a less than significant level; even though the DEIR concludes that the risk to safety and land use compatibility impacts will not be reduced to a less than significant level with Option I, it will significantly reduce the magnitude of these impacts with respect to the high school planned for this area. The location of the high school along Baseline Road is an essential element of the Placer Vineyards Specific Plan, designed to serve

P-7
↓

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the future population needs of both Placer Vineyards and surrounding areas. Since the high school cannot easily be relocated to achieve the 1,500 foot separation required by the State school siting requirements, either Option I or Option J are necessary to move the pipeline a sufficient distance from this planned high school in order to minimize the land use and risk to safety impacts.

↑
P-7
Cont.

With respect to the impacts of the Project on the planned elementary school, depending on the applicant's ability to work within the School District to resolve the District's safety concerns, the Owners Group supports either Option K or L to reduce these impacts to an acceptable level. If acceptable to the School District, Option L may be preferable since it would be less disruptive to biological resources; also, there may be some ability to relocate the elementary school site further south away from the pipeline by swapping the adjacent park site with the school site, thereby increasing the distance of the school site from Baseline Road to greater than 1,500 feet. (Any such relocation, of course, would be subject to approval by the Board of Supervisors, property owners, and School District.) Until any such relocation is approved, the Project applicant should assume that either Option K or L will need to be incorporated into the Project to reduce the potential impacts to the Project on the planned elementary school.

P-8

We understand that the DEIR indicates that the impacts to land use and risk to safety will still be significant with or without the incorporation of these alternative options. However, since the other increased impacts associated with these alternatives can be mitigated to less than significant levels, and since these alternatives address an issue of statewide concern regarding the siting of schools near high pressure gas pipelines, the incorporation of Options I and L into the Project makes this an Environmentally Superior Alternative. The goal of this DEIR is to present feasible alternatives that still promote the goals of the Project, while avoiding or substantially lessening any of the significant impacts associated with the Project; incorporating Options I and L into the Project, which will substantially lessen the risk of safety to the school uses planned for the Placer Vineyards Specific Plan certainly make this the Environmentally Superior Alternative that the CEQA Guidelines require for selection.

P-9

Given the significance of your determination that the Environmentally Superior Alternative requires the incorporation of Options I and L into the Project, this determination should be more prominently highlighted in the context of the DEIR and not relegated to the last page of the Executive Summary. At a minimum, in the description of the Alternatives to the proposed Project, before detailing the No Project Alternative and the various Option Alternatives, the Executive Summary could highlight that the Environmentally Superior Alternative has been determined to be the Project with the incorporation of Options I and L. Then, as readers of the DEIR review the balance of the Executive Summary and the overall document, they will be able to read and evaluate the various alternatives in context with the alternatives already deemed necessary to best mitigate the impacts of the Project.

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Project Superior Alternative.

As noted on page ES-1 of the Executive Summary, two of the stated objectives for the proposed Project are (i) extend natural gas service to planned residential and commercial developments in Placer, Sutter and Sacramento Counties; and (ii) install Project facilities in a safe, efficient, environmentally sensitive and cost-effective manner (emphasis added). Both of these objectives are better promoted by the Project with the incorporation of Options I and L (or Options J or K, or a combination thereof).

In particular, since the goal of this Project is to extend service to serve planned residential and commercial developments in Placer County, then the Project should be designed to be compatible with, and not disruptive of, the approved plans for the area. The Placer Vineyards Specific Plan required almost two decades of planning and was approved in July of 2007; this Plan includes a high school site along Baseline Road and an elementary school site within 1,500 feet of Baseline Road. While the DEIR indicates that the risk to safety can be mitigated to some extent, the placement of the line as proposed by the Project would make it infeasible for the School District to acquire the high school site and difficult for the School District to acquire the elementary school site. The locations of these school sites within the Placer Vineyards Specific Plan are integral to the overall design of the Plan; installation of the Project as proposed, without Options I and L (or similar relocation options), would completely undermine the planning efforts that were involved to develop the Placer Vineyards Specific Plan. Instead of serving the development needs of the Placer Vineyards Specific Plan, the Project as proposed, without incorporating Options I and L (or similar options), would have the reverse impact of impeding and preventing the development of the approved Placer Vineyards Specific Plan.

P-10

Also, as noted throughout the Report, Options I and L will substantially lessen the risk to safety impacts associated with the proposed location of the pipeline within 1,500 feet of the high school and elementary school sites. The mitigation measures proposed for the Project will not, in the absence of these alternative options, satisfy this necessary statewide school-siting requirement, which has been developed to specifically preserve and promote the safety of children gathering in higher density school environments. Without these alternative options being incorporated into the Project, the Project cannot meet its objective of installing the facilities in a safe manner, as dictated by applicable school facilities siting requirements.

Based on the foregoing, in addition to noting the environmental superiority of the Project with the incorporation of Options I and L, the DEIR should note that Options I and L will better promote the objectives of the Project than would be promoted by the Project without these alternative options. As noted on page 3-1 of the DEIR, CEQA requires consideration of a range of reasonable alternatives that could feasibly attain most of the basic Project objectives; with the

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incorporation of Options I and L into the Project, this alternative will actually attain more of the Project objectives than would be accomplished by the Project as proposed.

↑ P-10
Cont.

Description of Project.

Based on the above and the determination in the EIR that the Environmentally Superior Alternative is the Project with Options I and L, unless additional engineering alternatives and/or networks of low pressure gas lines can be incorporated as feasible alternatives within areas planned for greater urban density, we respectfully request that the Project be redefined to incorporate Options I and L at the outset. It seems appropriate that once the Environmentally Superior Alternative is identified through the EIR process, then the final Project should be fully analyzed with the incorporation of these alternatives. In this way, the approving body can be assured that all impacts associated with the Project, as mitigated by the incorporation of these alternatives, will be fully and adequately analyzed by the DEIR. The segments of the line being replaced by these alternative options could then be listed as alternatives, with a more summary explanation of why these originally proposed segments are inferior from an environmental and/or Project-based analysis.

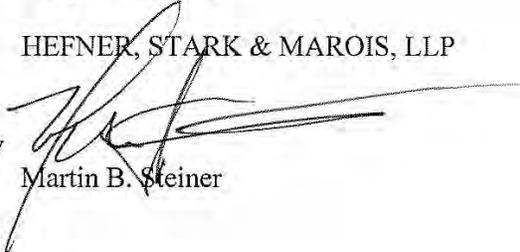
P-11

Thank you for the opportunity to comment on your Draft Environmental Impact Report. If you have any questions regarding any of our comments, please feel free to call us.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By


Martin B. Steiner

MBS:sk

cc: Kent MacDiarmid, Placer Vineyards Owners Group

K:\Placer Vineyards Development Group LLC\DA - Project Representation (6785-0002)\PGE Gas Line\lir_spurr (061209).doc

1 RESPONSE TO COMMENT SET P

2 **P-1** The proposed Line 407 is intended to serve the PVSP (approved by
3 Placer County Board of Supervisors on July 16, 2007), and the SVSP (still in the
4 planning stages).

5 Within the approved PVSP are seven dedicated school sites that will be developed
6 by the Center Joint Unified School District. School sites are also proposed to be
7 included in the SVSP, and a land use plan shows five proposed school site
8 locations. Two dedicated school sites within the PVSP (one high school and one
9 elementary) are located within 1,500 feet of the proposed Project pipeline.

10 Alternative Options I, J, K, and L were considered in order to reduce risks to
11 proposed school sites (refer to pages 3-55 through 3-57 of the Draft EIR).

12 Both Option I and Option J would have greater impacts to biological resources, but
13 these could be mitigated to less than significant levels. However, Option J would
14 place the pipeline close to several residences, while Option I would go through
15 agricultural land.

16 Option K would increase impacts to biological resources by placing the pipeline
17 within an area that has wetlands, vernal pools, and giant garter snake habitat. While
18 Option L would not increase or decrease any of the impacts associated with the
19 proposed pipeline, Option L was designed to decrease the magnitude of the risks to
20 the planned elementary school and minimize impacts to biological resources that
21 would result from implementing one of the alternative options at this location.

22 **P-2** One significant unavoidable impacts (Class I Impacts) associated with the
23 Project are unique to a pipeline project and are is related to air emissions during
24 construction. and exposure to people to unacceptable risk of upset/accident. Other
25 significant impacts that can be mitigated to less than significant levels (Class II) are
26 related to the physical environment in which the pipeline would be placed such as
27 biological and cultural resources, noise, water quality, etc.

28 Section 3.0 of the Draft EIR explains that CEQA requires consideration of a range of
29 reasonable alternatives to the Project or Project location that: (1) could feasibly
30 attain most of the basic Project objectives; and (2) could avoid or substantially
31 lessen any of the significant impacts of the proposed Project. An alternative may not
32 be eliminated simply because it is more costly or if it would impede the attainment of
33 the Project objectives to some degree. The CEQA Guidelines also require the

1 selection of an environmentally superior alternative. The determination of an
2 environmentally superior alternative is based on the consideration of how the
3 alternative fulfills the Project objectives and how the alternative either reduces
4 significant impacts or substantially reduces the impacts to the surrounding
5 environment.

6 The Draft EIR described a reasonable range of feasible alternatives to the Project
7 and to the Project location, including the No Project Alternative in Section 3.0.
8 These alternatives were evaluated for their ability to attain most of the Project goals
9 and to avoid or substantially lessen any of the significant impacts of the proposed
10 Project. Three major alternative routes were evaluated and rejected, as stated in
11 Section 3.2 of the Draft EIR, and one system-wide alternative was evaluated and
12 rejected as stated in Section 3.2.4. In summary, the overall proposed Project route
13 was found to have the fewest significant environmental impacts or magnitude of
14 significant environmental impacts. Within the overall proposed Project route, an
15 additional 12 alternatives (termed options) were developed. These options were
16 designed to minimize risk; minimize impacts to biota, listed species, and wetlands;
17 and respond to land owners' concerns. None of the options was found to reduce
18 ~~at the~~ Class I impact to a Class II impact; ~~however, two options were found to~~
19 ~~decrease the magnitude of a Class I impact, risk of upset.~~ However, two options
20 reduced the magnitude of the safety risk associated with two planned schools.
21 Those options, I and L, in conjunction with the proposed Project, represent the
22 environmentally superior alternative, which was adequately evaluated in the Draft
23 EIR.

24 The CSLC will make two decisions regarding the PG&E Line 406-407 Natural Gas
25 Pipeline Project at one of the CSLC's public meetings. The first decision will be
26 whether to certify the EIR that was prepared for the proposed PG&E Line 406-407
27 Natural Gas Pipeline project. The second decision to be made by the CSLC will be
28 whether to approve the environmentally superior alternative proposed project, which
29 is construction of the PG&E Line 406-407 Natural Gas Pipeline, inclusive of all
30 project components and Options I and L. The CSLC could also choose at that time
31 to approve any of the other options ~~and any alternatives~~ that were analyzed in the
32 EIR. A notice of the date, time, and location of the public meeting where the Project
33 will be considered by the Commissioners will be mailed to everyone on the CLSC
34 mailing list and to everyone who has commented on the Draft EIR, at a minimum of
35 10 to 15 days prior to the date of the meeting.

36

1 Since staff is recommending that the CSLC can approve the environmentally
2 superior alternative, which includes ~~Project with~~ Option I and Option L, it is not
3 necessary to revise the Project description to include options.

4 **P-3** The Project objectives, purpose, and need are presented in Section 1.1,
5 Project Objectives, Purpose and Need, of the Draft EIR. These Project objectives
6 include increasing natural gas service reliability to existing customers in the
7 Sacramento Valley region, including West Placer, Sacramento, and El Dorado
8 counties and providing service to new residential and commercial developments
9 over the next 25 years. The Project is needed, in part, to service the following
10 growth areas: the Metro Air Park, the Sutter Pointe Project, the PVSP, the Curry
11 Creek Community Plan, and the SVSP. In order to meet these objectives, Line 407
12 must be large enough in diameter and operate at a high enough pressure to function
13 as a major rib extension from PG&E's backbone pipeline system (Line 400 and 401)
14 to transport natural gas from Line 406 into the 12-, 16-, and 24-inch diameter Line
15 123, which operates at 500 psig in West Placer County and the 12- and 16-inch
16 diameter Line 119, which operates at 500 psig in Sacramento County.

17 A range of sizes from 24- to 36-inch diameter and operating pressures of 800 psig
18 and 975 psig were evaluated for Line 407 to identify the optimal design to increase
19 the capacity of the integrated network and meet the long-term load growth projected
20 for the system. A 30-inch diameter pipeline extending along the proposed route
21 operating at a Maximum Allowable Operating Pressure (MAOP) of 975 psig for both
22 Line 406 and Line 407 was identified as the design that provided the greatest overall
23 system benefit at the lowest marginal cost and impact to the environment.

24 **To address installation of smaller diameter pipeline:**

25 A smaller diameter and/or lower operating pressure design would either limit, or
26 prevent altogether, the pipeline from functioning as a major rib extension and fail to
27 meet the primary design objective for the Project. Reducing the size and/or MAOP
28 will reduce the capacity added to the system, require additional transmission
29 pipelines be built in the future either in the same right-of-way as the Project, or in
30 other locations, and reduce the operational flexibility to re-route gas on the system to
31 maintain reliable service to customers during pipeline maintenance.

32 To replace the capacity of 30-inch Line 407, PG&E would need to install either two
33 parallel 24-inch transmission pipelines, or four parallel transmission pipelines
34 consisting of two 20-inch and two 16-inch pipelines, all operating at the same MAOP
35 as Line 407. Installing multiple smaller diameter pipelines in lieu of a single 30-inch

1 pipeline would increase the mileage of pipelines within the Project area, and would
2 increase the impact on the environment, the risk of serious injury and fatality, as well
3 as the cost of serving the load growth projected on the system.

4 The volume of gas that can flow through a pipeline depends primarily on the
5 operating pressure differential, the pipe diameter, and the length of the pipeline.
6 When the operating pressure or pipe diameter is reduced, the natural gas flow rate
7 is also reduced. As a result, a reduction in the line diameter would require higher
8 pressures in order to flow the required 180,000,000 cubic feet of natural gas per day.
9 On the other hand, a reduction in the operating pressure would require a larger
10 diameter line (or multiple lines) in order to flow the same volume. Specifically, a 30-
11 inch line will flow nearly 20 times more natural gas than a 10-inch diameter line
12 operating under similar conditions. In other words, almost twenty 10-inch diameter
13 lines would be required to flow the same volume of natural gas as a single 30-inch
14 line.

15 The flow rate through a pipeline can be evaluated using the Weymouth formula; the
16 flow rate is proportional to the pipe diameter to the 2.667 power ($D^{2.667}$). The public
17 risks posed by these multiple lines in similar exposures, would be much greater than
18 the proposed Project. Substituting numerous smaller diameter natural gas
19 transmission lines in a similarly developed residential and commercial area would
20 pose a much higher risk to the public than the proposed single 30-inch diameter
21 transmission line. Although the actual results would depend on the population
22 density and other factors, the use of numerous (roughly 20) 10-inch diameter lines
23 would pose a risk on the order of 10 to 15 times that of a single 30-inch line flowing
24 an equivalent volume of natural gas.

25 **To address thicker piping:**

26 The pipe as proposed has adequate thickness to resist damage from construction
27 equipment beyond the size normally used in general construction. PG&E has
28 proposed, as a part of their Project, to install the pipeline to meet or exceed the
29 current pipeline regulations (49 CFR 192). Pipes with higher yield strengths than
30 those proposed can suffer from metallurgical issues including excessive hardness,
31 cracking, difficulty welding, etc. Thick-walled steel pipelines are typically used for
32 extreme conditions such as subsurface sea floor lines or risers. During the
33 manufacturing of thick-walled steel pipelines, the cooling rate at the time of
34 quenching of the pipe becomes slow, particularly at the central portion due to its
35 thickness, resulting in insufficient strength and toughness. This is because the
36 cooling rate is slow, and there is a high probability that the pipe will be brittle.

1 As provided in the Project Description and on pages 4.7-36 and 4.7-37 of the Draft
2 EIR, the following pipe wall thickness is proposed for the Project:

- 3 • For Class 1 areas, the minimum regulated pipe wall thickness is 0.3125-inch;
4 0.375-inch wall thickness pipe is proposed, 20 percent greater than the
5 minimum required.
- 6 • For Class 2 areas, the minimum regulated pipe wall thickness is 0.375-inch;
7 0.406-inch wall thickness is proposed, 8 percent greater than the minimum
8 required.
- 9 • For Class 3 areas, the minimum regulated wall thickness is 0.4875-inch; 0.500-
10 inch wall thickness is proposed, 3 percent greater than the minimum required.

11 The additional wall thickness will provide added strength. For example, the 0.375-
12 inch to 0.406-inch thick pipe wall would resist a 73 ton machine and the 0.500-inch
13 thick pipe wall would resist a 120 ton machine.

14 **To address deeper installations:**

15 As provided in the Draft EIR Section 3.0, Project Description, and as noted on page
16 4.7-36 of the Draft EIR, PG&E has proposed a minimum depth of cover of 60 inches
17 (5 feet). 49 CFR 192.327 establishes the minimum depths of required cover. For
18 Class 1 areas, a minimum of 30 inches of cover is required. For Class 2, 3, and 4
19 areas, a minimum depth of cover of 36 inches is required. As noted in the revised
20 System Safety and Risk of Upset report, which was prepared by EDM Services, Inc.
21 for the proposed Project and is included as ~~a part of~~ Appendix H-3 of this Revised
22 Final EIR, of the Draft EIR, "Pipelines with a depth of cover of 48-inches or greater
23 experienced a 30% reduction in third party caused incidents."

24 To address potential conflicts with other utilities, a mitigation measure (MM LU-1d)
25 has been added to section 4.9, Land Use and Planning. Refer to Section 4.0 of this
26 Revised Final EIR for revisions to the Draft EIR.

27 **To address protective outer casings with beacons:**

28 Installing the carrier pipe inside a casing pipe may reduce the potential for damage
29 from third parties, but would cause other technical issues. For example, an outer
30 casing has the potential to increase the risk due to external corrosion. A cased
31 installation would increase the likelihood of external corrosion, since the cathodic
32 protection system would be shielded from the carrier pipe. Should a leak develop, it
33 would be difficult or impossible to locate, since the gas would be contained within the

1 casing and migrate to the casing vent. Inspection and repairs to the carrier pipe
2 would also be problematic, since the pipe would not be accessible without first
3 removing the casing.

4 **To address lower pressure pipeline:**

5 The proposed system ties into other line segments. As a result, the operating
6 pressure must be high enough to be able to inject into the other segments and
7 provide a great enough differential pressure to achieve the required flow rate. For
8 example, Line 407-E would extend east from the junction of Line 407-W at Powerline
9 Road and connect with Line 123 at the intersection of Baseline and Fiddyment
10 Roads. In order for Line 407-E to feed the existing Line 123, the operating pressure
11 in Line 407-E must be higher than Line 123, which operates at 500 psig. Otherwise,
12 gas would flow from Line 123 into Line 407E, instead of the other way around. As a
13 result, the Project objectives cannot be achieved by reducing the operating pressure
14 of the proposed line segments without the construction of a compressor station.

15 Even though the project risk impacts are less than significant, additional measures
16 would be implemented to further reduce risks of project upset. MM HAZ-2a and MM
17 HAZ-2b have been revised. Refer to Section 4.0 of this Revised Final EIR for
18 revisions to the Draft EIR.

19 The Project Design Features and the proposed mitigation measures in the Draft EIR
20 (MM HAZ-2a and MM HAZ-2b) reduce the risk by approximately 50 percent. These
21 measures include the use of modern pipe, regular internal inspections using a high
22 resolution instrument (smart pig), corrosion mitigation, and the installation of
23 automatic or remotely operated shut-down valves. ~~However, the overall Project~~
24 ~~individual risk of serious injury or fatality would still be approximately 1:30,000, which~~
25 ~~exceeds the individual risk significance threshold of 1:1,000,000 for serious injury or~~
26 ~~fatality (used by the California Department of Education for school sites).~~

27 ~~Measures have been implemented to reduce the public risks. However, the lead~~
28 ~~agency recognizes that the risks remain significant even after mitigation. The CSLC~~
29 ~~will need to balance the economic, legal, social, technological, or other benefits of~~
30 ~~the proposed Project against its unavoidable environmental risks when determining~~
31 ~~whether to approve the Project. If the EIR is certified by the CSLC, a Statement of~~
32 ~~Overriding Considerations will need to be adopted at the time of certification and~~
33 ~~approval of the Project (CEQA Guidelines Section 15093).~~

34 **P-4** Please refer to response to comment P-3.

1 **P-5** Page 3-11 of the Draft EIR describes the “System/Facility Alternatives,”
2 which would construct approximately 15 separate projects within existing right-of-
3 way (ROW) already owned by PG&E, to the extent feasible.

4 This alternative was rejected from consideration in the Draft EIR because of its
5 additional length, the number of river crossings, and lack of offsetting benefits such
6 as avoidance of biological or other resources. This alternative would also have
7 generated greater construction impacts and would affect more people than the
8 proposed Project because portions would be constructed in proximity to the towns of
9 Yolo and Woodland.

10 PG&E provided information that to provide natural gas service to customers within
11 the service territory without the construction of the proposed Lines 406, 407, and the
12 DFM, the installation of 63 miles of new transmission pipelines would be required, at
13 significant additional expense and increased risk to the public. In order to replace
14 the capacity of the 30-inch transmission line, PG&E would need to install several
15 smaller pipelines (refer to response to comment P-3). Installing multiple smaller
16 diameter pipelines in lieu of a single 30-inch pipeline would increase the mileage of
17 pipelines, thereby increasing impacts on the environment, the risk of serious injury
18 and fatality, and the cost of serving the load growth projected on the system.

19

1 Below is an example of what PG&E would have to install for a systems alternative:

FAC ID	FACILITIES	Location	LENGTH MILES	DIAMETER INCHES	MAOP PSIG
L172	24" // 20" L172 from 40.07 to 49.28 (800 psig MAOP / 800 psig FDP)	Parallel E/O Hwy 5 from N/O Dunnigan to Zamora, Yolo Co	9.296	24	800
L172	24" // 20" L172 from 49.28 to 66.59 (800 psig MAOP / 800 psig FDP)	Parallel E/O Hwy 5 from Zamora to S/O Woodland, Yolo Co	16.427	24	800
L119	2.5 miles 8" Truxel DFM	North Natomas, Sac Co	2.500	8	720
L123	12" New DFM in Baseline Rd from L123 to Pleasant Grove Rd in Sutter Co (720 psig MAOP)	West Placer, South Sutter, North Sac Co	9.000	16	720
L116	24" // 12" L116 from MP 3.86 to MP 9.60 (720 psig MAOP / 720 psig FDP)	E/O Davis to West Sac across Yolo Causeway, Yolo Co	5.540	24	720
L119	16" // 12" L119 from Antelope Meter Sta - south	N/O Hwy 80, North Highlands, Sac Co	0.780	16	720
FLSM	16" // 12" in Palm and Madison btwn Hemlock DR and east of Fair Oaks Blvd	E/O Hwy 80, North Highlands, Carmichael, Citrus Heights, Fair Oaks	4.590	16	720
L173	12" // 8"/6" from MP 5.51 north to Penryn	N/O Hwy 80 north of Rocklin, West Placer Co	4.740	12	720
L173	12" // 6" Barton Rd DFM	N/O Hwy 80, Loomis, East Roseville	2.520	12	720
L173	12" // 6" from MP 12.48 to MP 16.58	N/O Hwy 80, Loomis, Penryn	3.540	12	720
L202	12" // 6/8" L202 in Grass Valley/Nevada City	Grass Valley, Nevada Co	3.000	12	720
L123	Replace 12" with 16" L123	S/O Lincoln, West Placer Co	4.200	16	720
	Totals		66.133		

2

3

4

5

1 **P-6** Please refer to responses to comments P-2 and P-3.

2 **P-7** Page ES-32 of the Executive Summary of the Draft EIR identifies the
3 environmentally superior alternative to be incorporating Alternative Options I and L
4 into the proposed Project alignment based on the decrease in the magnitude of
5 impacts to safety risks to planned schools. Please refer to responses to comments
6 G-5 and G-6 for a discussion of these options.

7 **P-8** Both options K and L were considered due to proximity to the planned
8 elementary school site in the PVSP area. Option K places the pipeline route outside
9 the 1,500-foot study zone, while Option L has the construction of the pipeline within
10 the proposed alignment for Line 407-E, within the 1,500-foot study zone, but at a
11 depth of 35 feet to reduce the magnitude of the risk to the planned school. In Option
12 L, PG&E would use HDD to place the pipeline at this increased depth (approximately
13 35 feet deep). PG&E has proposed to jointly develop a risk analysis with the School
14 District to determine pipeline impacts to the school (refer to APM ALT-L).

15 Option K would increase impacts to biological resources by placing the pipeline
16 within an area that has wetlands, vernal pools, and giant garter snake habitat. While
17 Option L would not increase or decrease any of the impacts associated with the
18 proposed pipeline, Option L was designed to decrease the magnitude of the risks to
19 the planned elementary school and minimize impacts to biological resources that
20 would result from implementing the other alternative option at this location.

21 The planned school site is located along Line 407. The maximum risk posed by Line
22 407 before mitigation is 1:2,062,000, and after mitigation is 1:4,115,000 chance of
23 fatality per year. The maximum risk posed by Line DFM before mitigation is
24 1:4,255,000, and after mitigation is 1:8,475,000. Because the calculated individual
25 risk is less than the threshold of 1:1,000,000, the risk is considered to be less than
26 significant.

27 Please also refer to response to comment P-2.

28 **P-9** The conclusion that the environmentally superior alternative is the
29 proposed alignment with options I and L incorporated is described in the Executive
30 Summary following the discussion of the proposed Project and all 12 of the options.

31 Text has been added to the Draft EIR on page 3-12, line 8 and page 3-58, line 25,
32 identifying the environmentally superior alternative. The environmentally superior
33 alternative is construction of the PG&E Line 406-407 Natural Gas Pipeline, inclusive

1 of all project components, and Options I and L. Refer to Section 4.0 of the Revised
2 Final EIR for revisions to the Draft EIR.

3 **P-10** See responses to comments P-1 through P-9. Text has been added to
4 the Executive Summary indicating that Options I and L, the environmentally superior
5 alternatives, would better promote the objectives of the Project than the proposed
6 alignment or other options (page ES-32, line 29). Refer to Section 4.0 of the
7 Revised Final EIR for revisions to the Draft EIR.

8 It should be noted that a revised System Safety and Risk of Upset report was
9 completed by EDM Services, Inc. (October 2009) for the proposed Project, and is
10 included as Appendix H-3 of this Revised Final EIR. The risk assessment included
11 risk measurement terminology that was not defined in the document, which has
12 resulted in some confusion. The Revised Final EIR provides an analysis that has
13 been clarified to account for individual risks to the public due to the potential for fires
14 and explosions, which may result from pipeline releases. The maximum risk posed
15 by Line 407 in the area of the planned schools before mitigation is 1:2,062,000, and
16 after mitigation it is 1:4,115,000 chances of fatality per year. This is less than the
17 1:1,000,000 threshold used by the California Department of Education for siting
18 schools. The highest risk along a segment of pipeline is to persons located
19 immediately above the pipeline, and the risk decreases as a person is farther away
20 from the pipeline. Because the calculated individual risk is less than the threshold
21 of 1:1,000,000, the risk is considered to be less than significant.

22 Societal Risk: Societal risk is the probability that a specified number of people will
23 be affected by a given event. Several release scenarios were used that could
24 impact both building occupants and vehicle passengers. The California Department
25 of Education (CDE) approach for evaluating the risk to the student population uses
26 two calculated parameters: an average individual risk across the depth of the
27 campus site, and a site population risk indicator parameter. The CDE does not
28 specify numerical criteria of acceptability or unacceptability for these indicators (CDE
29 Guidance Protocol for School Site Pipeline Risk Analysis, 2007). The threshold
30 values for societal risk vary greatly, depending on the agency or jurisdiction. There
31 are no prescribed societal risk guidelines for the United States or the State of
32 California. The Committee for the Prevention of Disasters and the Netherlands use
33 an annual probability of 1.0×10^{-3} (1:1,000) or less. This criterion has been used to
34 evaluate the proposed project. The societal risk posed by the proposed project is
35 less than the significance threshold of 1:1,000 or less.

1 **P-11** The environmentally superior alternative, that is the proposed alignment
2 including Options I and L, was identified and adequately analyzed through the EIR
3 process. Sections 4.0 through 4.14 of the Draft EIR provide a comprehensive
4 analysis of the proposed alignment and the additional analysis with Options I and L
5 is summarized in the Executive Summary. The rationale for selecting these options
6 is provided in Section 3.0, Alternatives and Cumulative Projects, of the Draft EIR.
7 No additional environmental evaluation of the Project or Project plus options is
8 necessary. Please refer to responses to comments P-1 through P-7.

9 The CSLC will make two decisions regarding the PG&E Line 406-407 Natural Gas
10 Pipeline Project at one of the CSLC's public meetings. The first decision will be
11 whether to certify the EIR that was prepared for the proposed PG&E Line 406-407
12 Natural Gas Pipeline project. The second decision to be made by the CSLC will be
13 whether to approve the environmentally superior alternative, which is construction of
14 the PG&E Line 406-407 Natural Gas Pipeline, inclusive of all project components
15 and Options I and L. The CSLC could also choose at that time to approve any of the
16 other options and any alternatives that were analyzed in the EIR.

June 12, 2009

Klein Family Farms
913 Ridgeview Drive
Woodland, CA 95695

California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

Dear Crystal Spurr,

I would like to take this time to thank you and the California State Lands commission for giving our family the opportunity to speak on this issue that greatly impacts our family farm. I would like to begin by giving you and the commission a little background information about our family farming operation. This particular farm is being farmed by two 3rd generation brothers and their children. Today's family farm has been developed by many years of dedication and hard work. Our farm operations were started by our grandfather, John W. Klein, in 1962. He migrated up to the fertile and diverse ground in Yolo County from Indio California in hopes to satisfy a dream of starting a family farm to support himself and his future family. He started farming with a \$2,500 loan, which he put his household furniture up for collateral (because this is all he had) for a production loan, to lease 200 acres of ground that no one else wanted to farm. Today our family farms approximately 5,000 acres of top quality land which produce tomatoes, wheat, sunflowers and almond trees. We employ approximately 20 full time employees and up to 300 contracted employees during the season for, planting, pruning, harvesting and hoeing weeds. Each year approximately 4,000 semi truck loads of commodities are delivered off our farm ever year.

Q-1

If you know any farmers you know farming is one of those professions that it is not an 8am-5pm, 5 days a week job, it is a way of life. For this reason, I have great concern about the Natural Gas Pipeline 406 going right threw the middle of approximately 25% of our farm operation. We have talked to PG&E many times about moving the pipeline so it will be placed along side of the county road to minimize the impact to our family farm. PG&E's reply is that "it is too costly." This project is going to be a hardship for our farm. The project is going to affect our permanent crop plantings like almonds, also affect our producing of all crops that we have contracted to deliver. These contracts are earned over many years of showing we can produce quality and quantity. This pipeline will create an economic hardship on our family farm, not only to us personally, but also to the employees, contracted labor, fertilizer companies, chemical companies, seed companies, parts stores, equipment companies, fuel companies, etc. that we deal with on a daily basis.

Q-2

The 406 pipeline also disrupts the infrastructure of our parcels when it comes to the most vital part of farming and that is water. During the growing season, we move water from one location to another by ditch or underground pipeline. It will be hard to move water when PG&E's pipe goes through a parcel.

Q-3

There is also a concern of meeting federal, state, and local regulations in regards to chemical application. Our farm, not being organic, sprays pesticides, herbicides, fumigations and fungicides year-round. A lot of the chemicals we must use have restrictions such as, 72 hours before reentering parcel and up to 500 feet work zones. This restricts accessibility to or near parcels.

Q-4

These may or may not be things PG&E has considered, but are items very important to us on a daily basis. I am sure it is easy for PG&E to only see that this project may effect a few, but will bring better service to many and more income to them. PG&E needs to know that this project they are proposing does not just affect a parcel of dirt, but 3 generations of literally hard blood and sweat that has been put into the soil, so others can simply go to the supermarket when they want to have food on their table.

Q-5

I would like to close my letter by saying that PG&E has offered us a compensation package that does not even come close and is offensive to the land values and the economic loss we will have if this project goes through as planned. Please reconsider the project route and the compensation plan. Thank you for your time and if you have any more questions please feel free to call Chris anytime at 530-681-5607.

Q-6

Sincerely,

Chris Ochoa & Mark Ochoa
Klein Family Farms

1 RESPONSE TO COMMENT SET Q

2 **Q-1** The comment provides background information on the status of the Klein
3 Farms including the number of acres farmed, number of seasonal and full-time
4 employees, and number of truck trips associated with the operation.

5 **Q-2** The statement and concerns regarding economic impact to farmland is
6 included in the public record and will be taken into account by decision makers when
7 they consider certification of the EIR and consider whether to approve the proposed
8 Project.

9 The proposed Project would result in the loss of 2.0 acres of orchards located within
10 Yolo County. The proposed Project would permanently impact 2.55 acres of
11 farmland across all four counties. Most of the agricultural land along the proposed
12 Project alignment is currently used for row or field crops; these uses could continue
13 within the permanent pipeline easement. Temporary and permanent agricultural
14 impacts are discussed on pages 4.2-23 through 4.2-25 of the Draft EIR.

15 Both temporary and permanent economic losses of normal farm operations are
16 required to be compensated as stated in the California Code of Civil Procedure.
17 PG&E is required to provide financial compensation for temporary and permanent
18 loss of agricultural uses through the California Code of Civil Procedure, as follows:

- 19 • Section 1245.030(b) requires compensation for property damage, including
20 crop damage, resulting from pre-construction project studies, testing,
21 surveying, etc.
- 22 • Section 1263.210(a) requires all property improvements, including agricultural
23 crops and associated facilities and infrastructure, in project land rights
24 acquisition compensation.
- 25 • Section 1263.250(a) requires compensation for crop damage/losses resulting
26 from project construction. It also requires scheduling project construction to
27 avoid impacts to agricultural crops when possible.

28 **Q-3** Page 4.2-22 of the Draft EIR has been revised to include APM AGR-1,
29 which requires that PG&E provide advance notification of Project activity to adjacent
30 landowners and tenant farmers to provide adequate warning of construction activity.
31 This mitigation measure would ensure that all landowners along the alignment are
32 notified of pending construction activity. APM AGR-1 requires PG&E to provide

1 advance notice (between two and four weeks prior to construction), by mail, to all
2 landowners and tenant farmers along the pipeline right-of-way. This advance notice
3 requirement would also require that a mechanism be set up for contacting PG&E
4 and/or the construction contractor to ensure landowners and tenant farmers can
5 coordinate scheduling. The inclusion of APM AGR-1 would ensure that adequate
6 notice is provided to underlying or adjacent property owners who may be affected by
7 project construction. Provision of such notice would allow concerned landowners or
8 agricultural operators (such as Klein Family Farms) the opportunity to contact PG&E
9 or the construction contractor to work out timing concerns.

10 PG&E has committed to working with landowners and their tenant farmers to avoid
11 or minimize impacts to agricultural crops and disruption to crop irrigation systems
12 during the proposed pipeline construction, including temporary or permanent re-
13 configuration of crop irrigation systems to maintain irrigation to crops adjacent to the
14 pipeline construction right-of-way. PG&E and their pipeline construction contractors
15 will take reasonable measures to avoid damage to crop irrigation systems and will
16 immediately repair all damage that does occur to crop irrigation systems during the
17 proposed pipeline construction. MM HWQ-2 has been revised to also reflect these
18 commitments. Refer to Section 4.0 of this Revised Final EIR for revisions to the
19 Draft EIR.

20 PG&E was able to download a copy of this letter from the CSLC website on June 17,
21 2009, has reviewed this comment, and is aware of the commenter's concern. PG&E
22 has further committed to work with Klein Family Farms to ensure fair compensation if
23 farming operations including irrigation, application of chemicals and harvest times
24 are affected by the proposed pipeline construction work.

25 **Q-4** PG&E has committed to working with landowners and their tenant farmers
26 prior to and during construction of the proposed pipeline to coordinate the
27 construction schedule with agricultural crop spraying schedules and harvest
28 activities, and to minimize crop production losses. Please also refer to response to
29 comment Q-3.

30 **Q-5** Comment acknowledged. Please refer to response to comment Q-2.

31 **Q-6** Comment acknowledged. Please refer to response to comment Q-2.

32

33

Sierra Vista Owners Group

1700 Eureka Road, Suite 140
Roseville, CA 95661

June 12, 2009

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

Via E-mail and U.S. Mail

**Re: CSLC EIR No. 740 (State Clearinghouse No. 2007062091) for PG&E
Line 406 and Line 407 Pipeline Project Land Use Compatibility with
Respect to the Sierra Vista Specific Plan**

Dear Ms. Spurr:

Please accept this letter as a formal comment on the above-referenced Draft Environmental Impact Report ("DEIR") by the Sierra Vista Specific Plan Owners, developers of the Sierra Vista Specific Plan development project ("Sierra Vista"). Sierra Vista comprises approximately 2,064 acres at the northwest corner of Baseline and Fiddymont Roads in Placer County ("County"). The City of Roseville ("City") anticipates annexing Sierra Vista into the City limits. Sierra Vista will complement the West Roseville Specific Plan area with new neighborhoods, schools, office parks, retail opportunities and other urban land uses.¹ Unfortunately, the high-pressure natural gas pipeline (the "Line 407 Project") proposed by PG&E would place a potentially hazardous facility along the southern boundary of Sierra Vista, potentially endangering an elementary school, public parks, commercial areas and residential development. Therefore, we are submitting this letter to the State Lands Commission (the "Commission") during the comment period on the DEIR in order to document our concerns related to potential land use and engineering conflicts between Sierra Vista and the Line 407 Project.

R-1

The Sierra Vista project area has been targeted for urban development since 1994 when it was included as an Urban Study Area in the Placer County General Plan. The City of Roseville and Placer County then entered into a Memorandum of Understanding (MOU) which outlines a cooperative process for any development applications within the MOU area. The majority of the Sierra Vista project lies within this MOU area. The Sierra Vista project area was then added to the City of Roseville's Sphere of Influence in 2004 and the current Sierra Vista project began processing in 2005. The City of Roseville issued a Notice of Preparation (NOP) in March 2008 indicating that an EIR would be prepared for the Sierra Vista project

R-2

¹ More information about the Sierra Vista Specific Plan is available at the City's website:
http://www.roseville.ca.us/planning/major_development_projects/sierra_vista_specific_plan.asp

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Page 2

Since proposing Sierra Vista in 2005, extensive planning and engineering work has been conducted which is reflected in a refined land use plan (attached hereto as Exhibit 1). This land plan was prepared with input from the City, and also takes into consideration comments from various public agencies collected during an initial environmental review period.² The land plan locates sensitive uses near Baseline Road, including various public parks, residential, commercial properties and an elementary school site.

↑
R-2
Cont.

Engineers from MacKay and Soms representing Sierra Vista met with PG&E personnel on October 31, 2008 for an overview of the Line 407 Project. As you know, regional transportation plans show Baseline Road being widened to a six-lane arterial roadway. A portion of the ultimate right-of-way for Baseline Road (and a segment of the Line 407 Project) is located along the frontage of Sierra Vista. Therefore, PG&E has requested a 50' non-exclusive easement (measured from the future back of curb) along the Sierra Vista segment of Baseline Road. PG&E has also requested an additional easement near Fiddymont Road for facilities related to the Line 407 Project. Such easements cannot be granted until the ultimate alignment of Baseline Road has been determined by the City and County.

R-3

Our engineers are concerned that the proposed alignment of the Line 407 Project would likely conflict with future improvements along Baseline Road. The EIR indicates that the Line 407 Project would have a minimum of 5' of cover, this is not enough given that we have not yet designed the ultimate grades along Baseline Road to accommodate the widening of Baseline Road, future intersections and the necessary underground utilities to serve Sierra Vista. Given the high cost and great difficulty that would be associated with a future realignment, proper location of Line 407 is vital. Actual pipeline separation requirements, and horizontal and vertical clearances, cannot be known with precision until the ultimate location of underground utilities, roadway alignments and driveway locations are determined. Similarly, future utility crossings for water, sewer, and drainage improvements for Sierra Vista and the Baseline Road construction project must comply with the necessary horizontal and vertical clearances. Future dry utility crossings for electric, gas, and telecommunications lines, as well as vehicle ingress and egress, also cannot be determined until exact horizontal and vertical clearances are known. Finally, any restrictions on landscaping or setbacks along Baseline Road should be determined in coordination with the City.

R-4

We would also like the EIR to address impacts to our proposed land uses for any ancillary equipment needed to serve the Line 407 Project such as pressure reducing station and valve clusters. We need more information on any ancillary equipment to evaluate the best locations based on compatibility with the Sierra Vista land uses.

R-5

² In the spring of 2008, the U.S. Army Corps of Engineers released a Public Notice (No. 200601050) reflecting its intent to prepare an Environmental Impact Statement (EIS) for its evaluation of Sierra Vista under Section 404 of the Clean Water Act and NEPA. At the same time, the City released a Notice of Preparation (NOP) for an Environmental Impact Report (EIR), which initiated the City's review of environmental impacts under the CEQA.

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Page 3

We are requesting that the ultimate design of the Line 407 Project address the above-described concerns. In addition, in order to minimize the risk of the potentially hazardous facility and to reduce the risk of potential future conflicts we are requesting the following modifications to the Line 407 Project:

1. The pipeline be placed under the future pavement section of Baseline Road
2. Increase the minimum pipe cover to fifteen feet
3. The pipe be encased in concrete
4. Increase the pipe wall thickness
5. Install a gas sensor system for leak detection

R-6

In summary, the attached land plan represents the culmination of a long process of careful land use planning and engineering work, in which PG&E has not actively participated. At this point, the Commission's review of the Line 407 Project in the DEIR must take into account the school sites and other sensitive land uses that are planned within Sierra Vista near the Baseline Road frontage. The requisite easements, clearances, and potential conflicts associated with the pipeline cannot be identified until the ultimate right-of-way for Baseline Road has been determined. It is apparent that greater consultation between the Commission and the City regarding potential land use conflicts is in order.

R-7

If you have any questions related to Sierra Vista, or desire additional information, please contact me at your earliest convenience. I can be reached at (916) 847-4482.

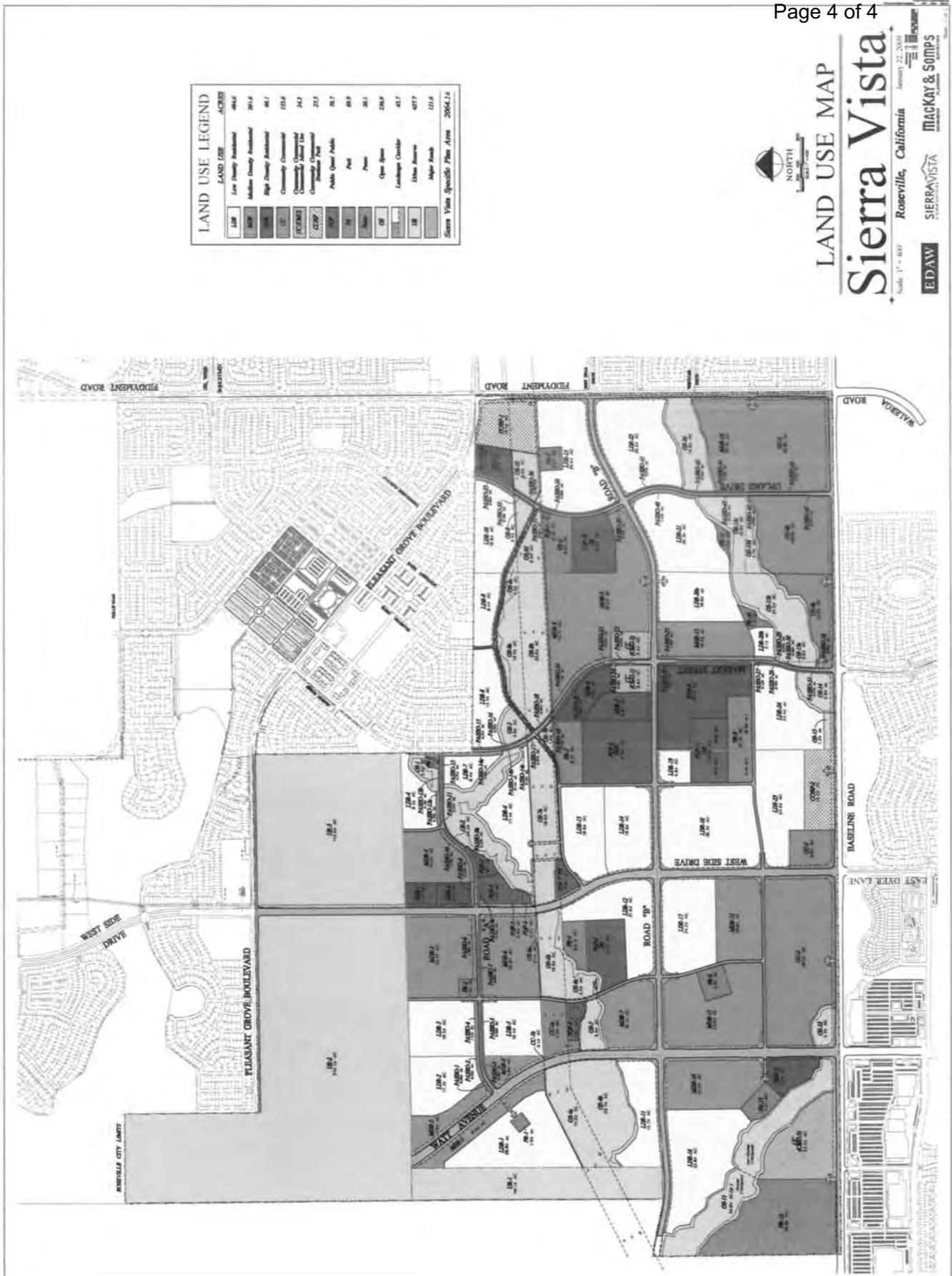
Sincerely,



Jeff Jones
Sierra Vista Project Manager

Enclosure

Cc: City of Roseville



LAND USE	ACRES
Low Density Residential	464.6
Medium Density Residential	261.6
High Density Residential	46.7
Community Commercial	123.6
Community Medium Density Residential	34.3
Community High Density Residential	23.7
Public Open Space	25.7
Public Open Space	89.9
Public Open Space	26.1
Public Open Space	228.9
Public Open Space	43.7
Public Open Space	427.7
Public Open Space	121.6



LAND USE MAP

Sierra Vista

Roseville, California January 22, 2009

SIERRAVISTA

MACKAY & SOMPS

EDAW

1 RESPONSE TO COMMENT SET R

2 **R-1** Please refer to responses to comments K-1 through K-5 regarding the
3 comment letter submitted by the City of Roseville. Their letter included comments
4 regarding the SVSP.

5 The Revised Final EIR provides an analysis that has been clarified to account for
6 individual risks to the public if a pipeline release were to occur with a subsequent fire
7 or explosion. The risk assessment included risk measurement terminology that was
8 not defined in earlier versions of the document, which has resulted in some
9 confusion. A revised System Safety and Risk of Upset report was completed by
10 EDM Services, Inc. (October 2009) for the proposed Project, and is included as
11 Appendix H-3 of this Revised Final EIR.

12 The risk analysis was revised because the aggregate risk was calculated and
13 reported as individual risk. In addition, the risk analysis incorrectly compared the
14 aggregate risk to the individual risk threshold of an annual likelihood of fatality of
15 1:1,000,000. The individual risk is defined as the frequency that an individual may be
16 expected to sustain a given level of harm from the realization of specific hazards, at
17 a specific location, within a specified time interval (measured as the probability of a
18 fatality per year). Aggregate risk is the total anticipated frequency of fatalities that
19 one might anticipate over a given time period for all of the project components (the
20 entire pipeline system). There is no known established threshold for aggregate risk.

21 The Sierra Vista Specific Plan (SVSP) is located along Line 407. The maximum risk
22 posed by Line 407 before mitigation is 1:2,062,000, and after mitigation it is
23 1:4,115,000 chance of fatality per year. Because the calculated individual risk is
24 less than the threshold of 1:1,000,000, the risk is considered to be less than
25 significant.

26 **R-2** ~~Please refer to responses to comments G-1, G-2, and P-7.~~ The MOU
27 between Placer County and the City of Roseville is discussed on page 4.9-17 of the
28 Draft EIR, under the heading City of Roseville General Plan and Sphere of Influence.
29 The Draft EIR considered the impact to potential land uses of the SVSP (refer to
30 Impact LU-2 on page 4.9-20 of the Draft EIR). Pipeline inspections are required and
31 would be completed by PG&E, including High Consequence Area (HCA) risk
32 assessments, which would be completed every seven years that the proposed
33 Project is in operation (refer to pages 4.7-36 and 4.7-37 of the Draft EIR).

1 In the Executive Summary of the Draft EIR and in Sections 4.3, Air Quality; 4.7,
2 Hazards and Hazardous Materials; 4.9, Land Use and Planning; and 4.10, Noise, of
3 the Draft EIR, school sites are identified as sensitive land uses. Sections 4.7,
4 Hazards and Hazardous Materials, and 4.9, Land Use and Planning, of the Draft EIR
5 also provide language regarding the California Education Code, section 17213, and
6 the California Code of Regulations, Title 5, section 14010(h), regarding the 1,500-
7 foot study zone between school sites and high-pressure gas pipelines. Page 3-3 of
8 the Draft EIR considers potential land use conflicts associated with school siting
9 requirements that require school districts to perform risk analyses when a school site
10 is located within 1,500 feet of an easement for an underground pipeline as one of
11 the reasons considered for looking at alternative locations. Safety risks to planned
12 school sites are discussed in the Executive Summary and in Section 4.7, Hazards
13 and Hazardous Materials and 4.9, Land Use and Planning, as revised in Section 4.0
14 of this Revised Final EIR.

15 School sites are proposed to be included in the SVSP, and a land use plan shows
16 five proposed school site locations. One proposed school site within the SVSP
17 (elementary school) is located approximately 1,500 feet north of the proposed
18 Project pipeline. As noted in Table 4.7-6 of the revised risk analysis attached to the
19 Revised Final EIR as Appendix H-3, the impacts are very minor at distances greater
20 than 800 to 1,000 feet. Since the planned elementary school site boundary is located
21 approximately 1,500 feet from the proposed pipeline, it is unlikely that serious risks
22 would be posed to students and others at the school site. At this distance from the
23 pipeline, the consequences from a potential fire or explosion are not expected to
24 result in any injuries.

25 **R-3** ~~Please refer to response to comment K-2 regarding the comment letter~~
26 ~~submitted by the City of Roseville. PG&E has indicated that the industry best~~
27 ~~practice is to install transmission pressure pipelines in a private easement whenever~~
28 ~~possible. PG&E does have transmission pipelines under paved road surfaces in~~
29 ~~Roseville, but those lines were installed post road improvements when no suitable~~
30 ~~location existed beyond the paved surface.~~

31 The industry best practice is based upon public and worker safety. A private
32 easement provides PG&E with additional control of co-occupants and uses. Patrols
33 and maintenance activities can be accomplished without exposing workers to traffic.
34 The pipeline can be exposed to add future taps to serve the communities or for
35 inspection without damaging the road surface or impeding traffic.

1 PG&E indicated they have utilized the best available information regarding the
2 Baseline Road alignment. PG&E will adjust the pipeline alignment if feasible once
3 the road design is finalized. PG&E has located the 50-foot easement at the future
4 Baseline Road back of curb per plans provided by the design firm of MacKay and
5 Somps. This easement is planned to be contiguous with the proposed landscape
6 strip.

7 **R-4** ~~Please refer to response to comment K-2 regarding the comment letter~~
8 ~~submitted by the City of Roseville. PG&E indicated they have been working with the~~
9 SVSP civil engineering firm of MacKay and Somps to coordinate the pipeline vertical
10 and horizontal alignment with the future road alignments determined by the City of
11 Roseville. PG&E has used the best design information available in locating the
12 pipeline. Currently the road improvement plans are limited to line work in plan view
13 only. The Baseline Road design has not progressed to include future elevations,
14 drainages or utility infrastructure. PG&E has designed the line with 8 feet of cover in
15 known intersections. The proposed 5 feet of cover is generally adequate for
16 driveway crossings. In the absence of final road improvement design drawings,
17 PG&E has increased cover at major road crossings to 8 feet. It is PG&E's
18 experience that 8 feet of cover will generally allow for typical road construction and
19 utility crossings. PG&E has stated a willingness to work with SVSP to coordinate
20 design and depth of underground utilities so that potential conflicts can be
21 addressed prior to construction of the pipeline.

22 The commenter has indicated that the proposed pipeline should be buried deeper to
23 avoid conflicts with other utilities. A mitigation measure (MM LU-1d) has been
24 added to section 4.9, Land Use and Planning, to address potential conflicts with
25 utilities. Refer to Section 4.0 of this Revised Final EIR for revisions to the Draft EIR.

26 PG&E also indicated they communicated to the City of Roseville that locating a
27 Class 1 bike path above the pipeline is acceptable and a compatible use. PG&E
28 intends to locate the pipeline in the center of the 50-foot easement. PG&E's
29 easement description does not exclude shrubs and groundcover, nor does it exclude
30 all trees. Vegetation exclusion is limited to "deep-rooted trees" within 10 feet of the
31 pipeline centerline

32 **R-5** ~~Please refer to response to comments K-2, K-3, and K-4 regarding the~~
33 ~~comment letter submitted by the City of Roseville. PG&E has indicated they advised~~
34 City of Roseville representatives that the station locations have some flexibility;
35 however, the existence of sensitive resources, and operational constraints, will limit

1 potential locations. PG&E representatives are available to work with both the City
2 and the CSLC on this issue. PG&E has also agreed to work with the City to enclose
3 the proposed Baseline Road station in a manner, and using materials, compatible
4 with the planned development and acceptable to both parties.

5 PG&E has indicated they advised City of Roseville representatives that underground
6 valves are existing equipment installed during a previous project and have discussed
7 with the City allowable and compatible uses over and near these existing valves.
8 PG&E representatives are available to work with the City on this issue.

9 **R-6** Please refer to responses to comments K-1, G-13, P-3, and U-12.

10 The industry best practice is to install transmission pressure pipelines in a private
11 easement whenever possible. PG&E does have transmission pipelines under paved
12 road surfaces in Roseville, but those lines were installed post road improvements
13 when no suitable location existed beyond the paved surface. The industry best
14 practice is based upon public and worker safety. A private easement provides
15 PG&E with additional control of co-occupants and uses. Patrols and maintenance
16 activities can be accomplished without exposing workers to traffic. The pipeline can
17 be exposed to add future taps to serve the communities or for inspection without
18 damaging the road surface or impeding traffic.

19 PG&E indicated they have been working with the SVSP civil engineering firm of
20 Mackay and Soms to coordinate the pipeline vertical and horizontal alignment with
21 the future road alignments dictated by the City of Roseville. PG&E has used the
22 best design information available in locating the pipeline. Currently the road
23 improvement plans are limited to line work in plan view only. The Baseline Road
24 design has not progressed to include future elevations, drainages or utility
25 infrastructure. PG&E has designed the line with 8 feet of cover in known
26 intersections. The proposed 5 feet of cover is generally adequate for driveway
27 crossings. In the absence of final road improvement design drawings, PG&E has
28 increased cover at major road crossing to 8 feet. It is PG&E's experience that 8 feet
29 of cover will generally allow for typical road construction and utility crossings. PG&E
30 has stated a willingness to work with SVSP to coordinate design of underground
31 utilities so that the potential conflicts can be addressed prior to construction of the
32 pipeline.

33 The commenter has indicated that the proposed pipeline should be buried with a
34 cover of 15 feet to avoid conflicts with other utilities. A mitigation measure (MM LU-

1 1d) has been added to section 4.9, Land Use and Planning, to address potential
2 conflicts with utilities. Refer to Section 4.0 of this Revised Final EIR for revisions to
3 the Draft EIR.

4 With regard to protective outer casings, installing the carrier pipe inside a concrete
5 casing or casing pipe may reduce the potential for damage from third parties, but
6 would cause other technical issues. For example, an outer casing has the potential
7 to increase the risk due to external corrosion. A cased installation would increase
8 the likelihood of external corrosion, since the cathodic protection system would be
9 shielded from the carrier pipe. Should a leak develop, it would be difficult or
10 impossible to locate, since the gas would be contained within the casing and migrate
11 to the casing vent. Inspection and repairs to the carrier pipe would also be
12 problematic, since the pipe would not be accessible without first removing the
13 casing.

14 PG&E has proposed as a part of their Project to install the pipeline to meet or
15 exceed the current pipeline regulations (49 CFR 192) (refer to pages 4.7-36 and 4.7-
16 37 of the Draft EIR, as revised in Section 4.0 of this Revised Final EIR). PG&E
17 intends to install minimum 0.375-inch wall thickness pipe on the 30-inch diameter
18 segments. A large proportion of the proposed pipeline would consist of 0.375-inch-
19 wall thickness steel pipe (Grade X-65) designed for a Maximum Allowable Operating
20 Pressure (MAOP) of 975 pounds per square inch gauge (psig). For Class 1 areas,
21 the minimum regulated pipe wall thickness is 0.3125-inch; a 0.375-inch wall
22 thickness is proposed, 20 percent greater than the minimum required. For Class 2
23 areas, the minimum regulated pipe wall thickness is 0.375-inch; a 0.406-inch wall
24 thickness is proposed, 8 percent greater than the minimum required. For Class 3
25 areas, the minimum regulated wall thickness is 0.4875-inch; a 0.500-inch wall
26 thickness is proposed, 3 percent greater than the minimum required.

27 Methane sensors are not generally recommended because emission levels under
28 normal pipeline operations should not be considered hazardous to the public. Per
29 CPUC regulations, PG&E odorizes its natural gas. The level of odorization is such
30 that it is generally detectable by human smell below levels that are considered
31 hazardous. PG&E also performs leak surveys on its pipelines on either an annual or
32 semi-annual basis, and hazardous leaks are repaired promptly.

33 **R-7** Please refer to comments R-1 through R-6. Please refer to responses to
34 comments K-1, through K-5 regarding the comment letter submitted by the City of
35 Roseville.