

RESPONSE TO COMMENT SET 17

Comment Number	Section of Draft EIR	Page Number(s)
17-1	Appendix A	
17-2	2.0 - Project Description 4.7 - Hazards and Hazardous Materials	Entire Section 4.7-13 to 4.7-46
17-3	2.0 - Project Description 4.2 - Agricultural Resources	2-15 to 2-19, 2-49, and 2-60 4.2-22 to 4.2-25
17-4	3.0 - Alternatives and Cumulative Projects	Entire Section
17-5	2.0 - Project Description 4.7 - Hazards and Hazardous Materials	Entire Section 4.7-13 to 4.7-46
17-6	2.0 - Project Description 4.8 - Hydrology and Water Quality	2-32 to 2-80 4.8-14, 4.8-15, 4.8-20, 4.8-21



July 19, 2007

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

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the
PG&E Line 406 and Line 407 Natural Gas Pipeline

Dear Ms. Spurr:

The Yolo-Solano Air Quality Management District (District) received a copy of the NOP for the above referenced project and appreciates the opportunity to review and offer comments. The area in our District's jurisdiction includes all of Yolo County and the northeastern portion of Solano County. For all projects, impacts to air quality are a concern for various pollutants, including regional impact of ozone, the impact of fine particles such as particulate matter less than 10 microns (PM10), and the localized impact of Hazardous Air Pollutants (HAPs).

18-1

The proposed PG&E Natural Gas Pipeline project includes construction of a 30-inch diameter pipeline approximately 40 miles long from Esparto in eastern Yolo County to West Roseville in Placer County. As noted in the NOP, the DEIR will evaluate the project's impact on regional air pollutants and their precursors as well as localized fugitive dust impacts. In addition, the analysis will address both operational (long-term) and construction level (short-term) impacts. As a reminder, the District considers a project significant if:

1. The project's emissions exceeds 82 pounds per day (ppd) of Reactive Organic Gases (ROG) or Oxides of Nitrogen (NOx), or 150 ppd of PM10.
2. The project would cause an exceedance of a California Ambient Air Quality Standard for any of the other criteria pollutants (i.e., Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), etc.)
3. The project contributes to an exceedance of or locates a sensitive receptor (e.g., school, households, etc.) within the District's action levels for acute or chronic hazard index of 1 or greater and 10 in a million increase cases for cancer.

18-2

The Sacramento Metropolitan Air Quality Management District Roadway Construction Emissions Model is considered to be the appropriate computer program for estimating project construction emissions from linear based projects, like pipeline installation. The Model is available for download from the webpage: www.airquality.org/ceqa/index.shtml#construction.

18-3

If the project is determined to be significant, mitigation measures are included below for Lead Agency consideration. The following list is not intended to be an exclusive list of possible measures, and the Lead Agency is encouraged to explore and incorporate additional feasible mitigation measures.

18-4



The mitigation of construction equipment exhaust should include strategies that reduce NOx, ROG, and PM10 emissions. These strategies may include restricting unnecessary vehicle idling to 5 minutes, incorporating catalyst and filtration technologies, and modernizing the equipment fleet with cleaner repowered and newer engines, among others. Many of the heavy-duty diesel mitigation measures may qualify for state and District incentive funding programs. Contact the District if interested in knowing more about our incentive funding programs.

18-4

As a side note, the District would like to point out that independent of the CEQA process, the following District Rules and Regulations may apply to the project:

- Visible emissions from stationary diesel-powered equipment are not allowed to exceed 40 percent opacity for more than three minutes in any one-hour, as regulated under District Rule 2.3, RINGELMANN CHART.
- Dust emissions must be prevented from creating a nuisance to surrounding properties as regulated under District Rule 2.5, NUISANCE.
- Any open burning requires approval and issuance of a burn permit from the District and shall be performed in accordance with District Rule 2.8, OPEN BURNING, GENERAL.
- Portable equipment, other than vehicles, must be registered with either the Air Resources Board's (ARB's) Portable Equipment Registration Program (PERP) (<http://www.arb.ca.gov/perp/perp.htm>) or with the District.
- Architectural coatings and solvents used at the project shall be compliant with District Rule 2.14, ARCHITECTURAL COATINGS.
- Cutback and emulsified asphalt application shall be conducted in accordance with District Rule 2.28, CUTBACK AND EMULSIFIED ASPHALT PAVING MATERIALS.
- District Rule 2.40 WOOD BURNING APPLIANCES prohibits installation of any new traditional "open hearth" type fireplaces.
- All stationary equipment, other than internal combustion engines less than 50 horsepower, emitting air pollutants controlled under District rules and regulations require an Authority to Construct (ATC) and Permit to Operate (PTO) from the District.

18-5

In conclusion, the District appreciates receiving this NOP and the opportunity to discuss the recommendations presented in this letter. A properly prepared air quality section will inform decision-makers and the public about the project's impacts and facilitate meaningful public dialogue. If you require additional information, please contact Dan O'Brien at (530) 757-3677.

Sincerely,

Matthew R Jones

Mathew R. Jones
Senior Air Quality Planner

RESPONSE TO COMMENT SET 18

Comment Number	Section of Draft EIR	Page Number(s)
18-1	4.3 - Air Quality	Entire Section
18-2	4.3 - Air Quality	Entire Section
18-3	4.3 - Air Quality	Entire Section
18-4	4.3 - Air Quality	Entire Section
18-5	A list of District rules and regulations that might apply to the project were provided. No response necessary.	



WILDLANDS, INC.

July 20, 2007

Ms. Crystal Spurr
California State Lands Commission
100 Howe Avenue
Suite 100-South
Sacramento, CA 95825-8202

**RE: State Clearinghouse Number 2007062091
PG&E Line 406/407 Project, Sacramento Valley**

Dear Ms. Spurr:

We learned about the above referenced project through the California State Clearinghouse, which publishes information on projects currently under California Environmental Quality Act (CEQA) review. One of the potential conditions of your CEQA review may require the permit applicant to mitigate for any wetland, wildlife habitat or agricultural impacts. Wildlands, Inc. specializes in providing a cost effective and environmentally sound solution to meet these mitigation requirements.

19-1

Wildlands, Inc. owns and operates multiple mitigation and conservation banks throughout California. Credits may be currently available for sale for any project required to provide mitigation in your area.

Please feel free to contact me or our Sales Coordinator Julie Maddox at (916) 435-3555 to inquire about how Wildlands can solve your mitigation requirements.

Very truly yours,

Wildlands, Inc.

Brian Monaghan
Project Director

RESPONSE TO COMMENT SET 19

Comment Number	Section of Draft EIR	Page Number(s)
19-1	4.9 - Land Use and Planning 4.4 - Biological Resources	4.9-19 to 4.9-20 Entire Section

Crystal Spurr - pipeline

From: <dibblesbs@inreach.com>
To: <spurrc@slc.ca.gov>
Date: 07/26/2007 10:14 AM
Subject: pipeline

I am sorry about thru lateness of this, but I just found out about the pipeline.

I am strongly opposed to this pipeline going across our property, we have such small acreage that it is hard to make enough money on the property to pay the taxes. This pipeline would restrict what we could plant making it harder to do this.

I do not understand why you could not use one of the other routes as there is nothing but hill land to infringe on. I know this is probably the cheapest route, but what about the inconvenience to us small farmers. The county did not care about us when they put in the rock plant to the west of us, hopefully you will.

I live on 27960 C.R. 19.

Thank you for your time.

William L. Dibble

20-1

RESPONSE TO COMMENT SET 20

Comment Number	Section of Draft EIR	Page Number(s)
20-1	3.0 - Alternatives and Cumulative Projects Alternative Options D and E were evaluated because they would avoid bisecting agricultural fields located between CR-17 and CR-19 east of CR-87. Each alternative is analyzed in all of the resource sections (4.1 through 4.14) of the Draft EIR.	3-14, 3-53, and Figure 3-2D



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In reply refer to:
1-1-07-TA-1220

OCT 29 2007

Christoffer Ellis
Pacific Gas and Electric Company
Technical and Land Services
2730 Gateway Oaks Drive
Sacramento, CA95833

Subject: Pacific Gas and Electric Line 406 and 407 Project in Yolo, Sutter,
Sacramento, and Placer Counties, California

Dear Mr. Ellis:

This responds to the *Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting* (NOP) for the proposed Pacific Gas and Electric (PG&E) Line 406 and 407 project (proposed project). The U.S. Fish and Wildlife Service (Service) received this NOP on June 21, 2007. Due to staffing constraints, the Service was not able to respond within the mandated comment period. The Service provides the following comments to aid PG&E and the California State Lands Commission, the California Environmental Quality Act (CEQA) lead agency, to prepare a Draft Environmental Impact Report (DEIR) that comprehensively addresses potential impacts to federally-listed species. The primary concern and mandate of the U.S. Fish and Wildlife Service (Service) is the protection of federally-listed species pursuant to the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (Act).

PG&E proposes to construct a new 30-inch diameter, 40-mile long natural gas pipeline to transmit and distribute natural gas to growing communities in Placer, Sutter, and Sacramento counties. Line 406 would begin on the existing Line 400 and 401 in Yolo County at the base of the Coast Range and extend to the existing Line 172A near the town of Yolo. Line 407 would extend from Line 172A east to the existing Line 123 near the city of Roseville in Placer County. A proposed distribution feeder main would extend south from Line 407 along Riego Road in Sutter County along Power Line Road and terminate at Elverta Road in Sacramento County.

Of primary concern to the Service are the potential for the proposed project to affect the following species:

- endangered vernal pool tadpole shrimp (*Lepidurus packardii*),
- endangered Conservancy fairy shrimp (*Branchinecta conservatio*),
- endangered Sacramento orcutt grass (*Orcuttia viscida*),
- endangered palmate-bracted bird's-beak (*Cordylanthus palmatus*),
- threatened slender orcutt grass (*Orcuttia tenuis*),
- threatened vernal pool fairy shrimp (*Branchinecta lynchi*),
- threatened giant garter snake (*Thamnophis gigas*),
- threatened California red-legged frog (*Rana aurora draytonii*),
- threatened California tiger salamander (*Ambystoma californiense*),
- threatened Colusa grass (*Neostapfia colusana*),
- threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*),
- threatened delta green ground beetle (*Elaphrus viridis*),

21-1

Direct Effects

The Service believes that the proposed project may directly affect the aforementioned species. Temporary and permanent ground disturbance from the clearing of pipeline right-of-way (ROW), trenching to install the pipeline, and construction of permanent and temporary access roads are all activities of concern. Excavation activities may result in increased erosion, leading to siltation of wetlands and other receiving water features, including drainage and irrigation canals (habitat for giant garter snake), and vernal pool features (habitat for vernal pool fairy shrimp, vernal pool tadpole shrimp, and vernal pool plants).

21-2

Giant garter snakes may be killed or injured by trenching activities to install pipeline. Giant garter snakes typically utilize aquatic habitats during their "active period" (May 1 – October 1) and are better able to escape danger associated with ground disturbance from heavy equipment. In the inactive period (October 2 – April 30), giant garter snakes typically retreat into terrestrial uplands to overwinter in mammal burrows and crevices, and are less mobile. The Service is concerned that activities associated with installing pipeline may result in adverse effects to giant garter snakes through direct mortality, harm, or harassment. The Service recommends that the DEIR address how these effects will be avoided, minimized, and, if necessary, off-set through compensatory mitigation by PG&E.

21-3

Vernal pool species are threatened primarily by loss and fragmentation of existing habitat. Vernal pool complexes, which are mosaics of wetted pools which are hydrologically connected and include the associated upland habitat and local watersheds essential for the function of the pools, must be preserved on a landscape level to ensure the persistence of the species that inhabit them. Although dispersal of vernal pool crustaceans between complexes is and probably always

21-4

has been relatively low, fragmentation of existing intact complexes could contribute to the loss of genetic diversity of vernal pool species, and reduce the likelihood of recolonization from other populations. Fragmentation by conversion or degradation of habitat may essentially serve as a barrier to dispersal. It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved across the range of each of the listed species to "buffer" against unforeseen stochastic events.

Construction of access roads or pipeline ROWs may serve to fragment existing vernal pool complexes by introducing impermeable or hardpacked surface which may disrupt the hydrology and mechanisms by which vernal pool species disperse. Vernal swales, which are sometimes present in vernal pool complexes and serve to "connect" pools, could be truncated by access roads or ROWs.

Ground disturbance associated with pipeline installation may result in colonization by non-native plants, animals, and insects. Non-native species may outcompete with crustaceans and plants in vernal pools, prey directly on native vernal pool species, and outcompete or prey on species which pollinate vernal pool plants. In addition, depending on the local soil and geological conditions, the hardpan may be as little as a few inches below the surface, in which case subsurface excavation could "break" the hardpan. Maintaining the hardpan is necessary to ensure surface and subsurface water contributions to the vernal pool features remain intact; otherwise, the inundation period of features, which is critical for the vernal pool crustaceans to complete their life cycle, may be irreparably disrupted. The Service encourages PG&E to strive to route the pipeline to areas outside of and as far away as possible from existing vernal pool complexes to prevent this from occurring.

Elderberry (*Sambucus* sp.) shrubs are the sole host plant and food source for the valley elderberry longhorn beetle (beetle). If proposed activities include removing or transplanting elderberry shrubs, or any ground disturbing activities within 100 feet of elderberry shrubs, PG&E should use the Service's July 9, 1999, *Conservation Guidelines for the Valley Elderberry Longhorn Beetle*, which can be found at the website http://www.fws.gov/sacramento/es/documents/velb_conservation.PDF.

Indirect and Cumulative Effects

CEQA guidelines require a discussion of the ways in which a project could potentially foster economic or population growth or the construction of additional housing in the surrounding environment. The DEIR should address the potential for the proposed project to contribute to economic or population growth or the construction of additional housing in the surrounding environment. The Service recommends that the DEIR provide the above discussion by

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21-6

Mr. Christoffer Ellis

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examining the relationship between energy supply and land use planning for this project, and demonstrate how growth inducing impacts to federally-listed species will be avoided or reduced to a level below significance.

21-6

The Service recommends the DEIR include an analysis of how the proposed project may affect implementation of existing and pending habitat conservation plans.

Potential Impacts on the Natomas Basin Habitat Conservation Plan

The DEIR should assess impacts of the proposed project on the Natomas Basin Habitat Conservation Plan's (NBHCP) operating conservation program. In particular, the DEIR should include a comprehensive and meaningful analysis of the proposed projects' effects on giant garter snake, the state-listed as threatened Swainson's hawk (*Buteo swainsoni*), and other Covered Species.

While the Service acknowledges that the proposed project is not urban development, the proposed project may result in significant effects to listed species in the Natomas Basin as a result of permanent and temporary habitat modification and disturbance, and is likely to adversely affect the implementation of the NBHCP (City of Sacramento *et al.* 2003). The proposed installation of natural gas pipeline could result in a loss habitat beyond that anticipated, analyzed and covered for take under Incidental Take Permits (ITPs) issued to the City of Sacramento (City), Sutter County, and the Natomas Basin Conservancy (Conservancy) for the NBHCP and could constitute a significant departure from the NBHCP's Operating Conservation Program. The NBHCP's ITPs cover the take of 22 plant and animal species, many of which are listed as endangered or threatened under the California Endangered Species Act and/or the Federal Endangered Species Act.

21-7

The ITPs issued to the Conservancy authorized the take of covered species associated with the restoration, enhancement, operation, and management of 7,758.5 acres of upland, managed marsh and rice preserves set aside as mitigation for the City's and Sutter County's development activities under the NBHCP. It appears that the route of the proposed Line 407 traverses through or directly adjacent to Conservancy preserves along Riego and Power Line roads. Activities associated with installation of a natural gas pipeline and establishment of a permanent utility easements in these preserves may negatively impact these preserves by: (1) resulting in additional direct, indirect and cumulative impacts to the NBHCP's 22 covered species; (2) negatively impacting restoration activities that have occurred or are planned in these preserves; (3) decrease biological connectivity between and within the Natomas Basin's three major geographic areas; (4) decrease the available acreage and locations of potential Conservancy acquisitions; and (5) adversely affect implementation of the NBHCP and its operating conservation strategy. The DEIR should address the impacts of the proposed project on the NBHCP's Operating Conservation Program.

Finally, the DEIR's should consider the potential indirect and cumulative impacts on the NBHCP's Covered Species. The following is a list of possible future projects that may represent reasonably foreseeable cumulative development in the basin. If they are deemed cumulative, the effects of the proposed project may be considerably greater in light of these potential land use changes, and result in increased conservation needs for the Covered Species in the basin.

Possible future projects in the Natomas Basin:

- Natomas Fish Screen Replacement Project
- Bureau of Reclamation's Sacramento River Water Reliability Study Project
- Sacramento Metropolitan Airport Expansion Project
- Sacramento Metropolitan Airport Master Plan
- Natomas Joint Vision Project
- Downtown to Natomas Rail Light Rail Transportation Project
- Sacramento Municipal Utility Substation Expansion Projects (numerous)
- Placer Parkway
- Western Area Power Agency's Sacramento Area Voltage Support Project
- Camino Norte (residential)
- Greenbriar (residential)

21-8

In highlighting what we view may be probable and reasonably foreseeable future development in the Natomas Basin, the Services recognizes that additional development in the basin beyond that authorized under the existing federal and State permits is proposed and all concerned parties should reasonably expect that to occur. Even though specific details regarding individual projects may not be available, the effects analysis needs to provide a more thorough assessment of reasonably foreseeable additional development in the basin and the cumulative impact of the proposed project in light of other reasonably foreseeable development on the long-term viability of the operating conservation program.

Potential Impacts on the proposed Placer County Conservation Plan

The proposed Placer County Conservation Plan (PCCP) is currently being developed. It is designed to address the increasing demand for urban development in western Placer County, while establishing a conservation strategy designed to avoid, minimize, and compensate for the loss or modification of wetlands, waters, and species habitat. Although the PCCP is not yet approved, the Service encourages PG&E to coordinate with Placer County, the City of Lincoln, and the other PCCP proponents to design their project which would avoid selecting an alternative which would preclude the success of a future PCCP.

21-9

Mr. Christoffer Ellis

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Please contact Jana Milliken, Senior Staff Biologist, at (916) 414-6561 if you have any questions concerning these comments for the Pacific Gas and Electric Line 406 and 407 Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Sanchez". The signature is fluid and cursive, with the first name "Kenneth" written in a larger, more prominent script than the last name "Sanchez".

Kenneth Sanchez
Assistant Field Supervisor

cc:

Mr. Todd Gardner and Mr. Jeff Finn, California Department of Fish and Game, Rancho Cordova, California

Ms. Crystal Spurr, California State Lands Commission, Sacramento, California

Mr. John Roberts, The Natomas Basin Conservancy, Sacramento, California

Mr. Scot Mende, City of Sacramento Planning Department, Sacramento, California

Mr. Larry Bagley, County of Sutter, Yuba City, California

RESPONSE TO COMMENT SET 21

Comment Number	Section of Draft EIR	Page Number(s)
21-1	4.4 - Biological Resources	Entire Section
21-2	4.4 - Biological Resources	Entire Section
21-3	2.0 - Project Description 4.4 - Biological Resources	2-50 to 2-51 4.4-61 to 4.4-72 (APM BIO 25- APM BIO 28), 4.4-94 to 4.4-108
21-4	4.4 - Biological Resources	4.4-61 to 4.4-72 (APM BIO 24), 4.4-79 to 4.4-108
21-5	4.4 - Biological Resources	4.4-94 to 4.4-108
21-6	6.0 - Other CEQA Sections Cumulative effects are discussed in each resource section of the Draft EIR	6-2 to 6-5
21-7	4.4 - Biological Resources	4.4-56, 4.4-58, 4.4-94 to 4.4-108
21-8	4.4 - Biological Resources Cumulative effects are discussed in each resource section of the Draft EIR	4.4-138 to 4.4-142
21-9	4.4 - Biological Resources	4.4-59

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

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FAX (951) 683-1144

SACRAMENTO
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FAX (916) 923-1222

SAN DIEGO
(619) 485-9526
FAX (619) 485-9412

OUR FILE NUMBER:

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December 12, 2008

VIA FACISIMILE (916) 574-1810 AND U. S. MAIL

California State Lands Commission
100 Howe Avenue Suite 1005
Sacramento, CA 95825-1810

Att: Crystal Spurr

Re: Request for Notices of Environmental Documents

Dear Ms. Spurr:

This office represents the Center Unified School District ("District").

We are requesting a copy of all future notices regarding the preparation, availability, and/or review of environmental documents and hearings related to PG & E's proposed high pressure pipe line L-407 Phase 1, also referred to as 406/407 project on Base Line Road in Placer County. Please provide copies of all notices to:

Elizabeth B. Hearey
Atkinson, Andelson, Loya, Ruud and Romo
The Atrium, Suite 200
5776 Stoneridge Mall Road
Pleasanton, CA 94588

and

Center Unified School District
8408 Watt Avenue
Antelope, CA 95843-9116
Att: Craig Deason, Assistant Superintendent Facilities and Operations

The proposed pipeline will impact a proposed District school site located within the Placer Vineyards Specific Plan Area on Base Line Road in Placer County.

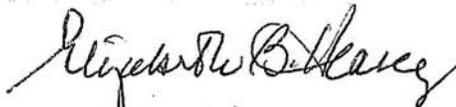
ATKINSON, ANDELSON, LOYA, RUUD & ROMO

Crystal Spurr
California State Lands Commission
December 11, 1008
Page 2

If you have any questions, please do not hesitate to contact me.

Very truly yours,

ATKINSON, ANDELSON, LOYA, RUUD &
ROMO



Elizabeth B. Hearey

EBH/rb

cc: Craig Deason (via email cdeason@centerusd.k12.ca.us)
Michael Winters (via email to cfw@cfwcardiff.com)

RESPONSE TO COMMENT SET 22

Comment Number	Section of Draft EIR	Page Number(s)
22-1	3.0 - Alternatives and Cumulative Impacts 4.7 - Hazards and Hazardous Materials 4.9 - Land Use and Planning	3-3, and 3-55 to 3-57 4.7-32 to 4.7-44 4.9-29 to 4.9-32



COMMENT SET 23

MARTIN B. STEINER
EMAIL: MSTEINER@HSM.LAW.COM

2150 RIVER PLAZA DRIVE
SUITE 450
SACRAMENTO, CA
95833-4136
TEL (916) 925-6620
FAX (916) 925-1127

January 7, 2009

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

*Via Email spurrc@slc.ca.gov
and Regular Mail*

**Re: CSLC EIR No. 740 for PG&E Line 406/407 Project
Compatibility and Adequacy of Alternatives Analysis Regarding
Placer Vineyards Specific Plan**

Dear Ms. Spurr:

Our firm represents the Placer Vineyards Development Group, LLC (“Owners Group”). The Owners Group is comprised of the owners of property within the Placer Vineyards Specific Plan who were instrumental in promoting and obtaining approval of the Placer Vineyards Specific Plan in Placer County (“Specific Plan”). Over many years, our Owners Group worked with the County of Placer and other interested agencies and utilities, including PG&E, to design and obtain approval of a comprehensive land use plan, covering over 2,000 acres near the City of Roseville, to meet the needs for growth in Placer County. Finally, after many years of planning and re-planning the Specific Plan to meet the needs of the County and to be compatible with area-wide development constraints and plans, the Owners Group received approval from the County in July 2007 of the Specific Plan land use entitlements; a copy of the map showing the land uses approved for the Specific Plan is enclosed herewith. Please note, in particular, the high density uses planned along Baseline Road, including the high school site on Baseline Road and the elementary school site located within approximately 1,000 feet of Baseline Road.

During this process, PG&E was fully aware of the land uses being proposed for the Placer Vineyards project. PG&E provided comments in 2006 to the Draft Environmental Impact Report that was then being circulated as part of the Specific Plan, a copy of which comment letter is enclosed herewith. At no time did PG&E object to the proposed land uses or the proposed locations of these land uses within the Specific Plan. Instead, their comments to the Specific Plan DEIR were focused on the compatibility of their service plans for the area, including their plans for a future 24-inch gas transmission line along Baseline Road. We understood from these comments that these planned gas transmission lines were intended to serve the planned growth for the area and would be compatible with the land uses planned for

Placer Vineyards. At no point did PG&E indicate that the gas transmission line planned for Baseline Road would be installed or operated as a high pressure gas line.

Now, as part of the Line 406/407 Project, PG&E is seeking to install a 30-inch high pressure gas transmission pipeline (designed to operate at up to 975 psi) along Baseline Road to connect to an existing gas transmission line at the intersection of Baseline and Fiddymont Roads. The location of this proposed pipeline will run along the northern boundary of the Specific Plan and, as shown by the map of approved land uses for the Specific Plan, this high pressure transmission line is proposed to be located within 1,500 feet of a planned elementary school site, adjacent to a planned high school site, and along high density residential and high density retail commercial uses approved for the Specific Plan.

We understand that the California State Lands Commission (“CSLC”) is the lead agency responsible for reviewing this Project and is in the process of preparing a comprehensive Draft Environmental Impact Report (“DEIR”) to analyze the potential environmental impacts associated therewith. Our concern is that, as proposed in both the preferred route and alternative routes, the location of a high pressure gas transmission line either along the northern boundary of the Specific Plan or through the Specific Plan (as proposed in one of the alternatives) will be completely incompatible with the approved uses for the Specific Plan. Furthermore, we are concerned that the Alternatives Analysis as proposed in your Notice of Preparation will not adequately consider the full range of feasible alternatives that could avoid the adverse impacts of locating a high pressure gas line adjacent to and/or near approved school and high density residential and commercial uses for this area.

As proposed, the location of a high pressure gas transmission line along Baseline Road will place two approved school sites in conflict with school siting requirements that must be followed by the school district when acquiring the approved sites. Section 14010(h) of Title 5 of the California Code of Regulations prohibits school districts from acquiring a school site located within 1,500 feet of an easement for an underground pipeline if such pipeline could pose a safety hazard as determined by a risk analysis study. We have confirmed with the Center Unified School District (within whose jurisdiction the approved school sites are located) that, in recognition of this State siting regulation and the inherent risks of locating school children near high pressure gas transmission lines, the School District will not agree to acquire school sites within 1,500 feet of a high pressure gas line. Accordingly, if Line 407 is designed as a high pressure gas transmission line and located along Baseline Road as proposed, the Project will conflict with and impair the ability to develop the Specific Plan as approved, which will disrupt years of planning for the area and threaten the viability of the entire project; if the Project is approved as proposed, all school sites in the Specific Plan would need to be relocated more than 1,500 feet from Baseline Road, which may not be feasible and may have other adverse planning impacts on the area. At a minimum, the reasonably foreseeable environmental impacts

23-1

23-2

23-3

23-4

More importantly, due to these reasonably foreseeable conflicts of the Project with the approved uses for the Specific Plan and the potential adverse environmental impacts associated therewith, CSLC needs to consider a full range of feasible alternatives that could eliminate the potential land use conflicts and avoid the potential adverse impacts posed by the proposed Project. In particular, each of the alternative alignments shown in the NOP will adversely impact the approved Specific Plan, either with the location along Baseline Road or through the Specific Plan; alternative alignments need to be considered that would avoid impact the Specific Plan altogether. Furthermore, the alternative for multiple lines operated at normal pressure, although mentioned in the NOP as to the entire project, should also be considered as a feasible alternative for the portion of the Project adjacent to or within the approved Specific Plan with schools and high density urban uses; regular pressure gas transmission lines, if located within and around the Specific Plan (and additional routes outside the Specific Plan to reach the point of connection), would presumably be more compatible not only with the planned school sites, but also with the high density urban uses planned along Baseline Road. Such improved compatibility may help avoid the conflicts and adverse impacts of the proposed Project with the approved Specific Plan uses outlined above.

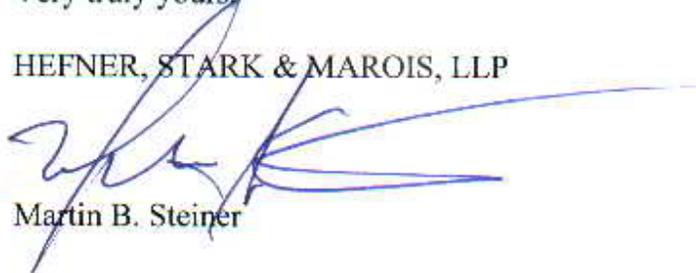
23-4
cont

Thank you for your consideration of our request. We look forward to working with you to assure that the DEIR and supporting analyses conducted for this pipeline project are complete and fully address all impacts and all feasible alternatives to minimize the environmental impacts associated with this Project, including the potential impacts on the development of the approved Placer Vineyards Specific Plan which is intended to be served hereby.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By


Martin B. Steiner

MBS:sk

Enclosure

cc: Kent MacDiarmid, The MacDiarmid Company
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RESPONSE TO COMMENT SET 23

Comment Number	Section of Draft EIR	Page Number(s)
23-1	3.0 - Alternatives and Cumulative Impacts Cumulative effects are discussed in each resource section of the Draft EIR	3-66
23-2	3.0 - Alternatives and Cumulative Impacts	Entire Section
23-3	3.0 - Alternatives and Cumulative Impacts 4.7 - Hazards and Hazardous Materials 4.9 - Land Use and Planning	3-3 to 3-5, and 3-55 to 3-57 4.7-25 to 4.7-46 4.9-29 to 4.9-32
23-4	3.0 - Alternatives and Cumulative Impacts 4.7 - Hazards and Hazardous Materials 4.9 - Land Use and Planning	Entire Section 4.7-25 to 4.7-46 4.9-29 to 4.9-32

CALIFORNIA STATE LANDS COMMISSION

PUBLIC HEARING IN THE MATTER OF
PUBLIC SCOPING MEETING FOR
PG&E PIPELINES 406 and 407

CONFERENCE ROOM
HOLIDAY INN EXPRESS
2070 FREEWAY DRIVE
WOODLAND, CALIFORNIA

MONDAY, JULY 9, 2007

3:03 P.M.

COPY

A P P E A R A N C E S

Ms. Crystal Spurr, State Lands Commission

Mr. Eric Gillies, State Lands Commission

Mr. Chris Ellis, PG&E

Mr. Joe Pennington, PG&E Manager

Mr. John Stone, property owner

Mr. Howard Lopez, property owner

Mr. Chuck Jensen, property owner

Ms. S. Jensen, property owner

I N D E X

Page

PANEL COMMENTS

Crystal Spurr, Eric Gillies 1

PG&E PRESENTATION

Chris Ellis 4

PUBLIC QUESTIONS, PUBLIC COMMENTS 7

P R O C E E D I N G S

1
2 MS. SPURR: We're going to start the Public
3 Scoping Meeting for the PG&E Line 406-407 natural gas
4 pipeline, for the pipeline EIR. It's July 9th, about 3:05
5 p.m., and we're transcribing this meeting so that we can be
6 able to comment, take questions, and have a record of that.

7 We have sign-in sheets available over there. If
8 you didn't sign when you came in, please sign when you leave
9 so that we can send you any notices for the future. I'm
10 sorry, I'll have to yell.

11 If you could sign in before you leave, if you
12 didn't sign when you arrived, so that we can have a record
13 of your name and send you any notices in the future.
14 There's also some speaker slips over there if you want to
15 comment after we give our presentation here, then please
16 fill that out and we'll call your name.

17 If you don't want to comment verbally then you can
18 write your comment on the back and we'll also take that. My
19 name is Crystal Spurr and I'm a Staff Environmental
20 Scientist with the California State Lands Commission in
21 their Environmental Planning and Management Department.
22 This is Eric Gillies, he's also with the California State
23 Lands Commission. Can you hear me?

24 MR. GILLIES: Barely.

25 MS. SPURR: Barely, still? Sorry.

1 MR. GILLIES: If the air conditioning machine was
2 louder then --

3 MS. SPURR: You probably can speak louder than me.

4 MR. GILLIES: Sorry about that. If you don't like
5 to sit up front --

6 MS. SPURR: Well, it's really loud right there.

7 MR. GILLIES: Oh, sorry.

8 MS. SPURR: And Jocelyn Macomis (phonetic) is
9 with our Land Management Division. We have Chris Ellis with
10 PG&E, he'll be giving a presentation later. Right now I'm
11 going to talk a little bit about the CEQA process and --
12 that's the California Environmental Quality Act -- and you
13 received our first notice, which is the Notice of
14 Preparation of an Environmental Impact Report.

15 What we're doing now with the Scoping Meeting is
16 taking your comments on anything you might want to see
17 environmentally, discussed in the Environmental Impact
18 Report. And we'll take that into consideration when we
19 prepare it.

20 The Notice went out June 19th and the comment
21 period ends on July 18th. So we need your comments by 5:00
22 on July 18th. So you'll get a chance also to comment when
23 the EIR comes out. We'll have a direct EIR and you'll be
24 able to comment on that and then when it goes to Commission,
25 our Commission, for certification of the EIR and approval of

1 the project, you'll also get a chance to -- if you want to
2 attend the Commission Meeting and comment to the Commission
3 members, at that time you'll be able to comment. So this is
4 not your only time you can comment on the EIR process.

5 We don't really have a schedule yet for the EIR.
6 We need to hire a consultant to prepare that draft EIR but
7 we're hoping to get started on it in October of this year
8 and then maybe it will go to Commission sometime in the
9 summer of 2008. So there's -- and the direct EIR when it
10 comes out will be available for public review for 45 days
11 and you'll be able to send in written comments.

12 And typically we have -- are we going to have a
13 public meeting?

14 MR. GILLIES: Yeah, there'll be one.

15 MS. SPURR: Typically we'll have a meeting during
16 that review time and you'll get a chance to verbally
17 comment, just like this. So, that's about the extent of the
18 CEQA process. Do you have any questions on the process? As
19 far as the EIR, at this time? Okay, so what we're --

20 FROM THE AUDIENCE: Is this just environmental
21 stuff or is it also in regards to property?

22 MS. SPURR: This is basically on the environmental
23 document. But PG&E is going to give a presentation on the
24 project. We're going to be responsible for overseeing the
25 preparation of the draft EIR. So these meetings are

1 basically for environmental purposes, for that draft EIR,
2 but PG&E will tell you what the project is and you can ask
3 them questions about the project at this time.

4 FROM THE AUDIENCE: Well, some of us feel that
5 like we weren't part of the --.

6 MS. SPURR: Okay.

7 MR. GILLIES: Right.

8 MS. SPURR: Right. And, yeah, and if it goes
9 through some people's property they may have some questions
10 and you can ask those at this time. So, this is Chris Ellis
11 from PG&E and he's going to give you an overview of the
12 project and then you'll get a chance after he speaks to ask
13 any questions that you have on the project itself.

14 MR. ELLIS: So, my name's Chris and I work in
15 PG&E's Land Department and I'm working on obtaining all the
16 permits and authorizations that may be required for the 406-
17 407 pipeline, both state and federal. And of course today
18 we're here for the State Lands Commission Public Meeting for
19 the authorization of a lease from State Lands Commission.

20 A little bit of background. PG&E is a gas and
21 electric utility in northern and central California. We
22 have an existing pipeline system which -- for northern
23 California the bulk of the gas comes from Canada. And on
24 the, if you look on this drawing here, the map to the left,
25 where that purple line ends and intersects into a yellow

1 dash line, that's our backbone transmission system which
2 comes down from Canada and that delivers the bulk of the
3 natural gas to this part of the state.

4 As you know, the greater Sacramento area,
5 including, you know, Placer, Sutter, Sacramento Counties,
6 there's been a tremendous amount of growth in these areas
7 for decades. And the result of that is that the existing
8 gas transmission capacity that we have in our pipelines is
9 basically taxed.

10 It's, we're shipping as much gas as we can, and we
11 need additional capacity to meet the needs that are out
12 there and that are forecasted to be developed over the next
13 ten, twenty years or so. So, in order to meet that we've
14 got engineers who are looking at ways to do that.

15 And we've looked at a lot of alternatives and in
16 this case the new transmission line capacity is the most
17 feasible and economical way to meet that demand. And so
18 when you look, at the existing system in this area, it
19 essentially forms a "U", with the capacity coming down into
20 Sacramento proper but the development is really north of
21 Sacramento. And that's what, we need more gas in that area.

22 So we looked at some alternatives for a pipeline
23 in that area, and that's on the second map over there, on
24 the right -- I know, it's kind of hard to see from here, but
25 if you have a chance to go over and look at it you can see