

RESPONSE TO COMMENT SET 3

Comment Number	Section of Draft EIR	Page Number(s)
3-1	3.0 - Alternatives and Cumulative Impacts 4.3 - Air Quality 4.7 - Hazards and Hazardous Materials 4.9 - Land Use and Planning 4.10 - Noise 4.12 - Population and Housing / Public Services / Utilities and Service Systems 4.13 - Transportation and Traffic	3-3, and 3-55 to 3-57 4.3-17 4.7-2, 4.7-5, 4.7-6, 4.7-32, 4.7-38, and 4.7-42 to 4.7-44 4.9-1, and 4.9-29 to 4.9-32 4.10-5, 4.10-19, and 4.10-30 to 4.10-32 4.12-8 and 4.12-9 4.13-19 (APM-TRANS-5), 4.13-24 and 4.13-24

COMMENT SET 4

Howard Lopez
Bonnie Lopez
27495 Co. Rd. 17
Esparto, Ca 95627

July 4, 2007

To whom it may concern,

We received your proposal on the Natural Gas Pipeline that is to run from Esparto to Roseville. We are landowners located on County Road 17 and our property goes south to County road 19, and is east of the intersection of 19 and 87.

According to your proposal the line 406 Southern Alternative on the west end will go east from the intersection of 87 and 19 and align with CR 17 on east side of I 505. Doing so will dissect our property in half at an angle. We strongly oppose this proposal for many reasons and have all intentions to fighting it for as long as it takes.

4-1

You are dictating on what we, and our heirs, can and can not plant on our own property. We were considering planting an orchard on this land but that would be impossible with the line going through the middle of our land and needing a 30 foot wide strip at an angle. With this line coming close to our home your asking us to ignore the effects on our way of life and our health with the possibility of gas leaks. You're risking our groundwater resources, digging up our prime agriculture land and disrupting our top soil forever. What unforeseen risks are you asking us to take?

4-2

There are other choices than to take prime agriculture land and dissect it, like going along an existing county road, or like Line 406 Central Alternative that follows along CR16.

4-3

Again, we plan on fighting this proposal with every means possible.

Respectfully,

Howard Lopez
Bonnie Lopez

RESPONSE TO COMMENT SET 4

Comment Number	Section of Draft EIR	Page Number(s)
4-1	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
4-2	4.2 - Agricultural Resources 4.7 - Hazards and Hazardous Materials	4.2-22 to 4.2-25 4.7-4, 4.7-9, 4.7-29 to 4.7-39
4-3	3.0 - Alternatives and Cumulative Projects Each alternative is analyzed in all of the resource sections (4.1 through 4.14) of the Draft EIR.	3-14 and 3-53

COMMENT SET 5

MEMO TO: CRYSTAL SPURR
STAFF ENVIRONMENTAL SCIENTIST
STATE LANDS COMMISSION
FROM: DOUG WIRTH
CO-TRUSTEE
ROBERT B. AND VESTA E. WIRTH FAMILY REVOCABLE TRUST
DATE: 7/13/07
RE: ENVIRONMENTAL IMPACT REPORT
P.G. & E. NATURAL GAS PIPELINE—407 WEST

Dear Ms. Spurr:

I am submitting these comments to the Notice of Proposed Environmental Impact Report regarding the P.G. & E. proposal to build a natural gas pipeline between Esparto, in Western Yolo County, and Roseville, in Placer County. My family's trust owns agricultural land near Yolo in Yolo County that would apparently be affected by the Preferred Route of Line 407 West.

Specifically, our property is described as the West Half of the East Half of Section 5, Township 10 North, Range 2 East. It is bounded on the West and South by State Highway 113. This coincides with County Road 17 on the south boundary. On the East and North, the property is bounded by other agricultural land.

It is not clear from the maps if the pipeline is proposed for the North or South side of Highway 113. If it is on the north side, it would cross our property about ¼ mile on the south end of the property. Of course, my family would prefer that the pipeline not cross our property at all. If it does end up coming through, I have the following concerns:

1. Irrigation. Our main irrigation well is on the south end of the property, adjacent to State Highway 113. This well has a pipeline that runs diagonally northwest to the Highway 113 frontage, and from there the water is conducted north one mile by gravity flow. This well irrigates the entire property. The well is directly in the path of the preferred alternative route. I am very concerned about disturbance of this well, contamination and/or interruption of the water supply for the property.
2. Width. The proposal indicates a 30' wide easement will be necessary. Within the easement, no permanent crops may be grown. This seems an excessively wide easement. 10' should be adequate for one pipeline. The impact of leaving so much unproductive and barren soil should be assessed.

3. Access. Since the entire quarter-mile frontage on State Route 113 on the south end of our property would be blocked by the pipeline route,

5-1

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5-3

5-4

the limitation on access to the property must be assessed. Will we be permitted to cross the easement with farm equipment, and will the easement permit us to construct future driveways across it for access to a future home site on the south end of the property. We need some amount of reasonable access across the easement to farm and live on the property..



5-4

4. Cable. There is a transcontinental telecommunications cable buried on the property, I believe in a north-south direction. The location of this cable needs to be spotted, so that it is not disturbed during construction.



5-5

5. Flooding. The location of the 407 West line is very near an historic breakout point of Cache Creek, located at County Road 17 near the SW corner of Sec. 5, T 10 N, R 2 E. The report should assess the effect of floodwaters eroding and covering the pipeline.



5-6

6. Earthquake. The risk of earth movement damage to the pipeline should be assessed, particularly where it crosses under waterways such as the Sacramento River.



5-7

7. Greenhouse Gas Emissions. On a general project analysis, I did not see any proposal for analysis of the global warming effects of the project. As an environmental scientist, you are well aware of the impacts of delivery of a large quantity of natural gas to developing areas in Placer County. This should be included in your report.



5-8

RESPONSE TO COMMENT SET 5

Comment Number	Section of Draft EIR	Page Number(s)
5-1	2.0 - Project Description	Entire Section
5-2	4.8 - Hydrology and Water Quality	4.8-19 to 4.8-20
5-3	4.2 - Agricultural Resources	4.2-22 to 4.2-25
5-4	2.0 - Project Description 4.2 - Agricultural Resources 4.13 - Transportation and Traffic	2-32 to 2-39 4.2-22 to 4.2-25 4.13-18 to 4.13-22
5-5	4.12 - Population and Housing / Public Services / Utilities and Service Systems	4.12-25
5-6	4.8 - Hydrology and Water Quality	4.8-15, and 4.8-20 to 4.8-22
5-7	4.6 - Geology and Soils	4.6-20 to 4.6-33 and 4.6-39 to 4.6-41
5-8	4.3 - Air Quality	4.3-12 to 4.3-13, 4.3-17 to 4.3-19, and 4.3-49 to 4.3-52



DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

July 16, 2007

VIA FACSIMILE (916) 574-1810

Crystal Spurr
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95802-8202

Subject: Notice of Preparation (NOP) for the PG&E Line 406/407 Project (Yolo, Sutter, Sacramento, and Placer County) **SCH# 2007062091**

Dear Ms. Spurr:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the DEIR for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

Project Description

The project being proposed by Pacific Gas & Electric (PG&E) is to construct an approximately 40-mile, 30-inch diameter natural gas pipeline (Lines 406 and 407). The project would run from the Esparto area in Yolo County east to Roseville in Placer County. There would be a potentially significant impact to agricultural resources, as the project would cross agricultural lands that may be under numerous Williamson Act contracts. Therefore, the Division recommends that the Draft EIR (DEIR) address the following items to provide a comprehensive discussion of potential impacts of the project on agricultural land and activities.

Agricultural Setting of the Project

- Location and extent of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and other types of farmland in and adjacent to the project area.
- Current and past agricultural use of the project area. Please include data on the types of crops grown, and crop yields and farm gate sales values.

To help describe the full agricultural resource value of the soils on the site, the Department recommends the use of economic multipliers to assess the total contribution of the site's

6-1

*The Department of Conservation's mission is to protect Californians and their environment by:
Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling;
Conserving California's farmland; and Saving energy and resources through recycling.*

potential or actual agricultural production to the local, regional and state economies. Two sources of economic multipliers can be found at the University of California Cooperative Extension Service and the United States Department of Agriculture (USDA).

6-1

Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly from project implementation and growth inducement, respectively.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely projects in the future.

6-2

Under California Code of Regulations Section 15064.7, impacts on agricultural resources may also be both quantified and qualified by use of established thresholds of significance. As such, the Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model. The California LESA model is a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website at:

http://www.consrv.ca.gov/DLRP/qh_lesa.htm

Mitigation Measures

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department recommends the use of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If a Williamson Act contract is terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

6-3

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands should be conducted regionally or statewide, and not limited strictly to lands within the project's surrounding area.

Other forms of mitigation may be appropriate for this project, including:

- Protecting farmland in the project area or elsewhere in the County through the use of less than permanent long-term restrictions on use such as 20-year Farmland Security Zone contracts (Government Code section 51296 et seq.) or 10-year Williamson Act contracts (Government Code section 51200 et seq.).
- Directing a mitigation fee to invest in supporting the commercial viability of the remaining agricultural land in the project area, County or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number below. General information about agricultural conservation easements, the Williamson Act, and provisions noted above is available on the Department's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

<http://www.conservation.ca.gov/dlrp/index.htm>

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Williamson Act Lands

Under California Code of Regulations Section 15206(b)(3), a project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres. Since lands under Williamson Act contracts and/or in agricultural preserves exist in the project area, the Department recommends that the following information be provided in the DEIR:

- A map detailing the location of agricultural preserves and contracted land within each preserve. The DEIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- A discussion of Williamson Act contracts that may be terminated in order to implement the project. The DEIR should discuss the probable impacts on nearby properties resulting from the termination of adjacent Williamson Act contracts. For example, a termination of a Williamson Act contract may have a growth-inducing impact. In other words, a termination may not only lift a barrier to development, but also result in higher property taxes, and thus, an incentive to shift to a more intensive land use, such as urban development.
- As a general rule, land can only be withdrawn from a Williamson Act contract through the nine-year non-renewal process. Immediate termination via cancellation is reserved for "extraordinary circumstances" (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). Under Government Code section 51282, the city or county must approve a request for cancellation and base that approval on

6-3

6-4

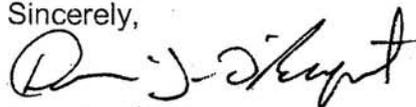
specific findings that are supported by substantial evidence. When cancellation is proposed, the Department recommends that a discussion of the findings be included in the DEIR. Finally, a notice of the hearing to approve the tentative cancellation and a copy of the landowner's petition must be mailed to the Director of the Department ten working days prior to the hearing. (The notice should be mailed to Bridgett Luther, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.)

- Under Government Code section 51243, if a city annexes land under a Williamson Act contract, the city must succeed to all rights, duties, and powers of the county under the contract. However, under section 51243.5, a city may exercise its option not to succeed to the contract if certain conditions are met. LAFCO must notify the Department within 10 days of a city's proposal to annex land under a contract (Government Code section 56753.5). Additionally, LAFCO must not approve a change to a sphere of influence or annexation of contracted land to a city unless certain conditions are met (see Government Code sections 51296.3, 56426, 56426.5, 56749 and 56856.5).
- If portions of the planning area are under Williamson Act contracts (and will continue to be under contract after project implementation) the DEIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code sections 51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of the land use.
- An agricultural preserve is a zone authorized by the Williamson Act and established by the local government to designate qualified land to be placed under the Williamson Act's 10-year contracts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Under Government Code section 51230, "An agricultural preserve may contain land other than agricultural land, but the use of any land within the preserve and not under contract shall within two years of the effective date of any contract on land within the preserve be restricted by zoning, including appropriate minimum parcel sizes that are at a minimum consistent with this chapter, in such a way as not to be incompatible with the agricultural use of the land." Therefore, the DEIR should also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.

6-4

Thank you for giving us the opportunity to comment on this NOP. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact Elliott Lum, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0869.

Sincerely,



Dennis J. O'Bryant
Program Manager

cc: State Clearinghouse

RESPONSE TO COMMENT SET 6

Comment Number	Section of Draft EIR	Page Number(s)
6-1	4.2 - Agricultural Resources	4.2-1 to 4.2-17
6-2	4.2 - Agricultural Resources	4.2-22 to 4.2-25, and 4.2-31
6-3	4.2 - Agricultural Resources	4.2-23 to 4.2-25
6-4	4.2 - Agricultural Resources	4.2-16, 4.2-17, 4.2-22, 4.2-23, and Figures 4.2-1A, 4.2-1B, and 4.2- 1C



COUNTY OF PLACER
Community Development Resource Agency

**ENVIRONMENTAL
COORDINATION
SERVICES**

John Marin, Agency Director

Gina Langford, Coordinator

COMMENT SET 7

FACSIMILE COVER SHEET

TO: Paul Thayer, Executive Officer

FAX # 916-574-1885

FROM: Peg Rein, Secretary

DATE: July 18, 2007

SUBJECT: PG&E Line 406/407 Natural Gas Pipeline NOP

PAGE # INCLUDING THIS COVER SHEET 4

MESSAGE:

The ERC (environmental Review Committee) has reviewed your NOP and has provided the following information.



COUNTY OF PLACER
Community Development Resource Agency

**ENGINEERING &
SURVEYING**

MEMORANDUM

DATE: JULY 17, 2007
TO: MAYWAN KRACH, ENVIRONMENTAL COORDINATION SERVICES
FROM: SARAH K GILLMORE, ENGINEERING AND SURVEYING
SUBJECT: PG&E LINE 406 & LINE 407 NATURAL GAS PIPELINE: NOTICE OF PREPARATION

The Engineering and Surveying Department (ESD) has completed our review of the above referenced application and offer the following comments for inclusion in the Environmental Impact Report to be prepared for the project.

TRANSPORTATION / CIRCULATION

See the attached Memo from the Department of Public Works.

MEMORANDUM

DEPARTMENT OF PUBLIC WORKS
County of Placer

TO: Phil Frantz, CD/RA

DATE: July 17, 2007

FROM: Andrew Gaber, DPW, Transportation

SUBJECT: **PG&E Line 406 & Line 407 Natural Gas Pipeline, NOP**

I have completed my review of the project description and NOP and have the following comments:

The applicant is proposing to install a 30 inch gas pipeline, either within or adjacent to Baseline Road, by open trenching. Based on current roadway configuration and traffic volumes on Baseline Road, the County will not permit any lane closures during the day on weekdays. The applicant must obtain an Encroachment Permit prior to doing any work within the public ROW.

7-1

Baseline Road will be widened initially to 4 lanes by the developers of Placer Vineyard and ultimately to 6 lanes prior to build out of the development. The timing of the installation and location of the gas pipeline shall be coordinated with the County, the City of Roseville, the developers of Placer Vineyards and Sierra Vista and other utility companies to avoid future conflicts and work within the roadway.

7-2

Therefore, the environmental analysis shall provide a discussion of:

Traffic implications of the various proposed alignments and construction methods. What construction hours are proposed, what traffic lane closures or detours are proposed, what traffic, noise and air impacts will be created? What are the implications of constructing the line sooner, prior to the roadway widening, rather than installing the line in conjunction with the roadway widening? What are the implications of installing the line using open trenching versus trenchless methods? What accommodations are necessary to allow for construction of other utility lines within the Baseline ROW?

7-3

One of the alternative alignments will run under the proposed corporation yard within Placer Vineyards. This is proposed to be a full service maintenance facility which will have gas and oil tanks, as well as possibly a CNG fueling station. What are the necessary clearances between these facilities? Are there other implications of having these facilities in close proximity?

7-4

RESPONSE TO COMMENT SET 7

Comment Number	Section of Draft EIR	Page Number(s)
7-1	1.0 - Introduction 4.13 - Transportation and Traffic	1-8 and 1-9 4.13-18 to 4.13-20; APM TRANS-3 and APM TRANS-6
7-2	4.13 - Transportation and Traffic	4.13-18 to 4.13-20; APM-TRANS-1 through APM-TRANS-8
7-3	2.0 - Project Description 3.0 - Alternatives and Cumulative Projects	2-27 to 2-85 3-1 to 3-58
7-4	4.7 - Hazards and Hazardous Materials	4.7-41 to 4.7-45