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CALIFORNIA STATE
LANDS COMMISSION
JUL 23 2009
PM 1:32

Crystal Spurr, Project Manager
California State Lands Commission
100148 Ave Avenue, Suite 100-South
Sacramento, CA 95825

Subject: Comments to Project Title "Pacific Gas and Electric Company (PG&E) Line
406-407 Natural Gas Pipeline (SCH No. 2007062091)

Dear Ms. Spurr:

The purpose of my letter is to provide comments in response to your letter titled Notice of Availability/Public Meetings Draft Environmental Impact Report "and mailed 29 April 2009.

I have reviewed the Line 406 and Line 407 Pipeline Project Overview Map and the Line 406 and 407 Pipeline Project Alternatives Map. These proposed routes begin from Line 401 located on the western side of Yolo County north of Township of Capay and goes eastward toward the City of Roseville to PG&E's existing Line 123. Also I am a property owner of land being considered by either proposal so I may have a bias; however I will try to be objective with my comments.

1. The proposed pipeline transverses from the west to the east side of Yolo County and into Sacramento County. On its proposed route it would go through fertile lands laid down over thousands of years by Cache Creek and the Sacramento/Feather Rivers. Part of the pipeline would cut through the Dunnigan Hills which has been declared a specific wine appellation area and can not just be called grazing lands.
2. Construction is a very destructive process to fertile ag land. Water percolates into ground water. Construction could intersect this process and effect ground table water.
3. Yolo County has had an objective to promote farming. Their detailed objectives can be reviewed by going online to www.yolocounty.org. Under County Administrator, General Plan Update their vision statement is outlined. A pipeline would prohibit future deep rooted farming practices (e.g., walnut, almond, fruit trees & grape vines) over the proposed line. This has the affect of not only reducing farm income but includes associated ag related jobs & related economic infrastructure. An attachment dated July 22, 2003 to Judy Brown , California State Lands Commission has comments regarding the Draft EIR for Kinder Morgan Concord to West Sacramento Pipeline Project (State Clearing house Number 2002022019 EIR 711) from Lynnel Pollock, Chair Yolo County

Board of Supervisors is provided for additional detail on Yolo County's planning to promote farming. Has Yolo County & Sacramento County been afforded the opportunity to provide comments?

4. The Sacramento Bee's Business Section had an article indicating the Sacramento area has 20% of its homes unoccupied at present. When PG&E made their studies in 2007 basing data studies on prior experience there could have been support for a natural gas need. A sea of events has changed economics and environmental concerns in the intervening years. There is a major emphasis not only to conserve energy but also to support renewable energy. Roseville, Sunset City, Loomis etc. have been an area under development.. But with the present mortgage problems in this area a big question is raised. Many homes are being foreclosed. "Do we need to build more homes ~~and~~ which have lengthy commutes to jobs in Sacramento and else where?" Another question raised is do we really want to pave over and build upon fertile land? We could be depriving ourselves of food, oxygen generating plants, carbon foot print reductions, plus jobs to employ our present population. Just recently the Sacramento Bee in its editorial pages talk of citizens leaving this State because of taxes & jobs.

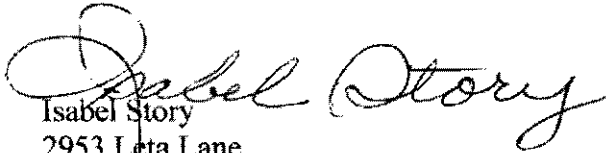
5. Homes built have had increased square footage (aka McMansions). Now interest is to downsize homes which not only saves land but consumption of natural resources as well. Downtown Sacramento has increased its population with lofts & condos. For years the City of Davis has been trying to have a slow growth movement in action. Our San Joaquin Valley has had very rapid growth and much of its lands have been paved or built upon. If you don't believe me, traverse Highway 99 in that area. Suburban living with large acreages may be a thing of the past. Should we make the same philosophy apply to the Sacramento Valley?

6. Natural gas is not a renewable energy source. Currently it is abundant and we should not consume this natural resource just because it is abundant. Russia is preparing to sell natural gas to the US and is constructing huge buildings, ships & infrastructures to provide this commodity. This will result in another huge transfer of wealth to a foreign plus dependency upon said country for this product. Lessons have not been obvious with China within the last 20 years or Russia's actions with Europe. How about conservation of the natural gas we do have available? Further, California's law requiring power providers to get 20% of their electricity from green sources by the end of 2010 maybe increased to 33% by 2030. SMUD uses natural gas to generate electricity for this area. Doesn't this apply to PG&E? So by 2010 a large demand for natural gas in this area could be reduced significantly so that PG&E would not have to increase capacity to provide reliable service for anticipated demand to the existing gas transmission and distribution pipeline.

7. Planning for the use of California's Lands needs to be carefully weighted. Greater capacity to PG&E also means greater revenue. Statistics are about what has happened and projections based upon statistics may not necessarily be indicative of events which follow. The State Lands Commission should be about planning for the State's future needs.

Thank you for affording the opportunity to express my concerns on land use in this State.

Sincerely,

A handwritten signature in cursive script that reads "Isabel Story". The signature is written in black ink and is positioned above the printed contact information.

Isabel Story

2953 Leta Lane

Sacramento, CA 95821

Phone number: 916.489.4709

Email address: imstory47@gmail.com

May 27, 2009

Attachment as stated above dated July 22, 2003 to Judy Brown, CSLC in paragraph numbered 3.

ATTACHMENT "A"

DRAFT

July 22, 2003

California State Lands Commission

Attn: Judy Brown

100 Howe Avenue, Suite 100-South

Sacramento, CA 95825-8202

Re: Comments Regarding the Draft EIR for the Kinder Morgan Concord to West Sacramento

Pipeline Project (State Clearinghouse Number 2002022010 EIR 711).

Dear Ms. Brown,

The purpose of this letter is to provide comments in response to the above referenced Draft

Environmental Impact Report (EIR). It has been submitted in accordance with the 30-day

review period, which will end on July 28, 2003. The County retains the right to submit further

comments during later stages of the State Land Commission's environmental review, should

new information and/or analysis become available.

Based on the information provided within the Draft EIR, the County has the following concerns:

- To minimize impacts on agricultural practices, utility lines should follow the edges of fields in

existing utility or transportation corridors, or along property lines. Pipelines crossing agricultural areas should be buried deep enough to avoid conflicts with normal agricultural or construction activities.

- Utilities should be designed and constructed to minimize any detrimental effect on levee

integrity or maintenance.

- The construction of pipelines on and near productive agricultural lands and operations

should be avoided during harvest season.

- The pipeline should be buried deeper in areas where certain agricultural practices are used

(e.g., eight feet in lands suitable for grape production that have not been deep ripped; at

least two feet below the bottom of existing irrigation and drainage ditches; or obtain the

landowner's agreement to bury the pipeline at a shallower depth).

- The subsidence of Delta lands due to the oxidation of its peat soils should be taken into

consideration when determining the depth at which pipelines should be buried to avoid

impacts to agricultural operations and terrestrial wildlife.

attachment

- Pipelines should be weighted or anchored in areas where saturated soils may cause the pipeline to float.

- An Encroachment Permit should be obtained from the local flood control or reclamation districts before any drilling under levees occurs.

4

- A business plan and inventory will be required from the County Environmental Health

Department if the threshold quantities of hazardous materials are stored at construction

staging areas for greater than thirty days.

- A Conditional Use Permit will be required from the County Planning and Public Works

Department prior to the commencement of construction.

- As a part of the Conditional Use Permit review by the County, a determination will be

required from the City of Davis regarding the consistency of the proposed project with the

City-County Pass-Through Agreement.

The Board of Supervisors thanks the State Lands Commission for their thorough analysis of the

proposed project. If you have any questions about the items addressed in this letter, please

contact Linda Caruso, Planner, at (530) 666-8850. The opportunity to review this environmental

document is appreciated.

Sincerely,

Lynnel Pollock, Chair

Yolo County Board of Supervisors



Enterprise Rancheria

Estom Yumeka Maidu Tribe

3690 Olive Hwy
Oroville, CA. 95966 -5723

Ph: (530) 532-9214
Fax: (530) 532-1768
Email: info@enterpriserancheria.org

May 28, 2009

Crystal Spurr
Project Manager

**RE: PACIFIC GAS AND ELECTRIC COMPANY LINE 406-407 NATURAL GAS
PIPELINE**

Sutter, County

Enterprise Rancheria EPA Department

**The tribes offer site monitors to assist on these projects.
We need a map of the Sutter area that will be affected !**

Our protocol is as follows.

If during ground disturbing activities, any resources are uncovered all work shall cease within the area of the find, pending an examination of the site and materials by a professional archaeologist and tribal monitor.

If any remains are uncovered, the Health and Safety Code 7050-55097.9 shall be enforced and strictly adhered to!

The tribe will work with local authorities on the disposition of cultural resources.
We will be working with the tribes in our area and you on this project!

EPA Planner
Site Monitor

Ren Reynolds



When developers and public agencies assess the environmental impact of their projects, they must consider "historical resources" as an aspect of the environment in accordance with California Environmental Quality Act (CEQA) Guidelines section 15064.5.

These cultural features can include Native American graves and artifacts; traditional cultural landscapes; natural resources used for food, ceremonies or traditional crafts; and places that have special significance because of the spiritual power associated with them.

When projects are proposed in areas where Native American cultural features are likely to be affected, one way to avoid damaging them is to have a Native American monitor/consultant present during ground disturbing work. In sensitive areas, it may also be appropriate to have a monitor/consultant on site during construction work.

A knowledgeable, well-trained Native American monitor/consultant can identify an area that has been used as a village site, gathering area, burial site, etc. and estimate how extensive the site might be. A monitor/consultant can prevent damage to a site by being able to communicate well with others involved in the project, which might involve:

1. Requesting excavation work to stop so that new discoveries can be evaluated;
2. Sharing information so that others will understand the cultural importance of the features involved;
3. Ensuring excavation or disturbance of the site is halted and the appropriate State laws are followed when human remains are discovered;
4. Helping to ensure that Native American human remains and any associated grave items are treated with culturally appropriate dignity, as is intended by State law.

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From: <dibblesbs@inreach.com>
To: "Crystal Spurr" <spurre@slc.ca.gov>
Date: 06/01/2009 8:32 PM
Subject: gas pipe line

This is in regards to the proposed gas pipe line 406-407 that is proposed to go through my property located at 27960 C.R. 19 North of Esparto. It will devalue my property as long as the pipe line is in service, which is for 50 years. The amount you have offered is incredibly low \$7700.00 for 50 years, is ridiculous.

You restrict me from growing grapes or any deep rooted crops, if you have looked at our area you have seen numerous new orchards going into production, as the income from these crops are signifinaly higher than the crops now grown. Almonds are going for \$4500.00 per acre and grapes at \$4200.00 per acre. I barley make enough to pay my property taxes now so this will leave me at a great disadvantage for future income.

I will receive no benefit from the gas line. They have not offered me free Gas and Electric for the right to use and destroy my land.

When the geologist came out to talk to me about this project he informed me that the gas line was 100% safe. I went into goggle search and found this to be untrue, there have been 22,500 ruptures to 30-36 inch gas pipe lines.

The C.R. 16 route I asked about. I was informed that this route was not considered because of side hill "solving" (his word) I have driven this route and again this is untrue as the area proposed between C.R. 87 and Interstate 505 is as flat as the C.R. 16 alternate. From there the line will have to go through the Dunnigan hills which according to you will cause "slouving".

I have been lets not say lied to but have been told things that are untrue, so I cannot believe anything I have been told about this project.

My mother lives just to the West of me at 28000 C.R. 19 she is very concerned about this project also as we share income of my property, and the possibility of a pipe line rupture.

I thought I lived in the United States, at least that is what they told me when I went to war to defend this country. I might as well live in a third world communist country where you have No rights, as this is what you are trying to tell me.

William Dibble
Barbara Dibble
Dorothy Dibble

MIWOK
MAIDU

United Auburn Indian Community
of the Auburn Rancheria

JESSICA TAVARES
CHAIRPERSON

JOHN SUEHEAD
VICE CHAIR

DAVID KEYSER
SECRETARY

DOLLY SUEHEAD
TREASURER

GENE WHITEHOUSE
COUNCIL MEMBER

May 27, 2009

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

Subject: DEIR - Pacific Gas and Electric Company (PG&E) line 406-407 Natural Gas Pipeline

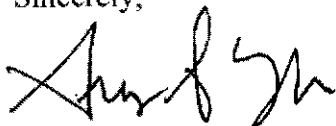
Dear Ms. Spurr,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) is comprised of Miwok and Maidu people whose traditional homelands include portions of Placer and Nevada counties, as well as some surrounding areas. The Tribe is concerned about development within ancestral territory that has potential to impact sites and landscapes that may be of cultural or religious significance. We appreciate the opportunity to comment on the proposed project.

We understand that, with the exception of one isolated obsidian biface and one unevaluated prehistoric habitation site near Line 407-East, no other prehistoric cultural resources have been recorded in the vicinity of the project site. As stated in the archaeological report, the area in general is sensitive for buried prehistoric resources. In the event of an inadvertent discovery of prehistoric cultural resources or human burials, we would like to be contacted immediately to provide input on the appropriate course of action. Should excavations for site testing or data recovery become necessary, we would like to be informed in order to provide on-site tribal monitors.

If you have any questions, please contact Shelley McGinnis, Analytical Environmental Services, at (916) 447-3479.

Sincerely,



Greg Baker
Tribal Administrator

CC: Shelley McGinnis, AES

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May 29, 2009

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

Dear California State Lands Commission,

Here are some of the concerns that we have with the PG&E line 406/407 Natural Gas Pipeline project coming through our property that we will be bringing up at the June 4th meeting in Woodland with the PG&E and the California State Land Commission:

1. It will devalue our property as long as they have the pipeline easement.
2. The amount that they offered us for our 1.562 acres was way too low.
3. Our property is prime ag land, we have grown tomatoes, bell peppers seed crops, orchard crops, wheat, corn, organic crops and livestock.
4. They will restrict us from ever planting almonds on the pipeline easement which the loss to a grower would be around \$4500. 00 per acre. Over a 15 year period for us on our 1.562 acre, the loss amounts to \$105,435.00.
5. They will restrict us from ever planting grapes and the loss to the grower would be \$4200.00 per acre.
6. Other companies that have gotten easements on property such as cell phone towers are paying the property owner \$1000 to \$1200 per month for the easements.

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7. They will be segmenting our property with a new easement when only 230 yards away they already have an easement along the county road.
8. Activities with heavy equipment such as leveling, deep ripping and simply crossing this line will be restricted.
9. The landowner will get zero benefit from the pipeline.
10. They will have the right to come on our property whenever they see fit.
11. We will be put at risk do to the fact of the size of the line and that natural gas will be flowing though it for a potential leak and explosion.
12. The pipeline will be crossing a known earthquake fault line in the vicinity of freeway 505.
13. Our first choice is the no project option. Second choice is Option E in the Environmental Impact Report from the California State Lands Commission dated April 29,2009

Any question call us at 787-3384.

A handwritten signature in black ink that reads "Howard & Bonnie Lopez". The script is cursive and fluid, with the names connected together.

Howard and Bonnie Lopez



Center Joint Unified School District

8408 Watt Ave., Antelope, CA 95843
916-338-6337 or 916-338-6417
Fax 916-338-6339
Facilities and Operations

BOARD OF TRUSTEES

Nancy Anderson
Gary N. Blenner
Matthew L. Friedman
Libby A. Williams
Donald E. Wilson

SUPERINTENDENT

Dr. Kevin Jolly, Ed.D

June 9, 2009

VIA EMAIL to spurrc@sic.ca.gov and U.S. Mail

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

Re: Comments on Draft Environmental Impact Report for Pacific Gas and Electric Company (PG&E) Line 406-407 Natural Gas Pipeline Project

Dear Ms. Spurr:

On behalf of the Center Unified School District ("District"), I am submitting the following comments regarding the PG&E Line 406/407 Natural Gas Pipeline Project Draft Environmental Impact Report ("DEIR").

OVERVIEW AND GENERAL COMMENTS

The Project, as described in the DEIR, is PG&E's proposal to construct a 30-inch diameter natural gas pipeline (Lines 406 and 407) and a new distribution feeder main from Esparto in Yolo County east to a location near Roseville in Placer County. The Project also includes the construction of six above-ground facilities. The natural gas pipeline is a high pressure pipeline and, therefore, poses unique safety risks for development, including schools, in the vicinity.

The District has plans to build a future high school which will be located on Baseline Road within the Placer Vineyards Specific Plan. The high school site is within fifty (50) feet of the proposed pipeline. In addition, the District plans to build an elementary school within the Placer Vineyards development which is within 1400 feet of the proposed pipeline. (See DEIR 4.7-5-4.7-6) Pursuant to an agreement between the District and the owners of the Placer Vineyards development project, these parcels of land have been identified and made available for acquisition by the District for purposes of building the schools. The District has already gone through an extensive and expensive planning process with the developer to identify these sites which are suitable for elementary and high school campuses. Similarly, the Sierra Vista Specific Plan proposed land use plan includes five dedicated school sites that will be developed by the District. The closest proposed school site to the pipeline is an elementary school site within the Sierra Vista Specific Plan located approximately 1500 feet north of the proposed Project pipeline. (DEIR 4.7-5-4.7-6)

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The District is concerned that the Project implementation could have a number of significant direct and indirect impacts on the District and its planned projects. The DEIR should place greater emphasis on the principle that schools must be treated as a sensitive land use given the concentration of young children within and around school facilities for many hours of the school day and during after-school activities.

The District has concerns regarding the Project's potential health and safety impacts on its schools. The District requests that the EIR fully take into account the Project's potential direct and indirect impacts on nearby school facilities pursuant to the requirements established in California Code of Regulations, title 5, including section 14010 which sets forth specific criteria for school sites. Specifically, section 14010 requires that all districts select a school site that provides safety and that supports learning. Section 14010(h) provides:

The site shall not be located near an above-ground water or fuel storage tank or within 1500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study, conducted by a competent professional, which may include certification from a local public utility commission.

Accordingly, the pipeline should be located more than 1500 feet from the identified school sites given the hazards associated with a high pressure pipeline.

The District requests that the EIR recognize the unique nature of school facilities as provided under California law. Schools are one of the most protected land uses. The development of new schools and the expansion and modernization of existing schools trigger various special requirements which make finding an adequate school site very difficult. The regulations require review by the California Department of Education, the Department of Toxic Substances Control and various other agencies, and often require special studies to confirm that stringent standards are met. Such studies may involve various agency consultations and oversight and the use of rigorous study protocols. This very high level of review creates great difficulty in establishing a site for and constructing school facilities. Therefore, the District is very concerned that the proposed Project may subsequently preclude the District from building schools as planned near the Project area, including a high school and elementary school, and that the Project will raise the costs of construction, or otherwise impact the District's ability to construct new facilities at these locations.

The DEIR analyzed various alternatives including various pipeline alignment options. The District requests that the pipeline route be changed to an alternate route to the north. The District supports, in varying degrees, the following alternatives as described below.

1. The District supports and prefers "Option J" because it will place the pipeline the farthest distance away from the high school site and outside the requested 1500-foot buffer zone. However, the District would also support "Option I" because it places the pipeline more than 1500 feet from the high school site. Because the pipeline is closer to the high school site under this "Option I," it is the less preferred alternative but would be acceptable.

2. The District supports and prefers "Option K" to "Option L" because under "Option K" the pipeline would be outside the 1500-foot buffer for the proposed elementary school site. "Option L" would allow the pipeline within 1500 feet of the proposed elementary school site but would require a risk assessment and possible corrective measures which could be costly to the District. There can be no assurance that the risk assessment would find that the site will not pose a safety risk with or without corrective measures under "Option L." If the risk assessment found a safety risk even with corrective measures, the school site would not meet the standards set forth in the California Code of Regulations, title 5, section 14010.

The DEIR is inadequate in that not all reasonable alternatives have been fully explored. The DEIR should also consider, as an alternative, the utilization of multiple smaller pipelines to deliver gas in lieu of the high pressure pipeline on Baseline Road. Smaller pipelines should be located away from school sites.

SPECIFIC COMMENTS

1. The District opposes the planned Project because of the proximity of the pipeline location to school sites. The District would support various Options set forth in the DEIR.

2. The District supports "Option I" described on DEIR ES-10, line 32-ES-11, line 26 as a less preferred but acceptable alternative. As stated therein,

This option would result in a reduction in the magnitude of impacts to aesthetics and noise due to the movement of a portion of the pipeline to a location with fewer residences. This option also would reduce the risk of upset hazards to a planned high school site. (ES-11, lines 11-14.)

Similarly the DEIR provides:

Option I will move the pipeline to a location outside of the 1500 foot safety buffer required by state school regulations. (DEIR ES-32, lines 14-16.)

The DEIR notes that a location such as a school that houses or attracts children is a "sensitive receptor." (DEIR 4.3-16, lines 10-16.) This DEIR conclusion supports the choice of "Option I" because the pipeline will be farther from the school than 1500 feet.

3. The District prefers and supports "Option J" as described on DEIR ES-11, line 27-ES-12, line 22. "

This option would result in a reduction in the magnitude of impacts to aesthetics and noise due to the movement of a portion of the pipeline to a location with fewer residences. This option also would reduce the risk of upset hazards to a planned high school site. (ES-12, lines 7-10.)

The District supports this option as it avoids the location of the pipeline within 1500 feet of the school site.

The DEIR notes that a location such as a school that houses or attracts children is a "sensitive receptor." (DEIR 4.3-16, lines 10-16.) This conclusion supports the choice of

“Option J” because the pipeline will be farthest from the school. The increase in distance from the school site to the pipeline affords greater safety to the District’s students and staff than “Option I.”

4. The District prefers and supports “Option K” as described on DEIR ES-12, line 23-ES-13, line 20. As stated therein,

This option would help reduce the risk of upset to a planned elementary school because the pipeline will be more than 1500 feet from the school site. (ES-13, lines 3-4.)

The DEIR notes that a location such as a school that houses or attracts children is a “sensitive receptor.” (DEIR 4.3-16, lines 10-16.) This conclusion supports the choice of “Option K” because the pipeline will be farther from the planned elementary school than “Option L.”

5. The District supports “Option L” described on DEIR ES-13, line 14-ES-14, line 7 as a less preferred alternative. Under California Code of Regulations, title 5, section 14010, a high school site more than 1500 feet from a high pressure gas pipeline is allowable. Option L does not create a 1500-foot buffer but instead provides for PG&E and the District to jointly develop a risk analysis in accordance with California Code of Regulations section 14010(h) to evaluate potential pipeline impacts to the school. If the assessment determines that there is a risk of serious injury or fatality presented by the pipeline, the DEIR states that corrective measures would be recommended to reduce the probability and/or consequence such that the risk is reduced to an acceptable level per the above mentioned regulation.

The District notes that a risk analysis and resulting mitigation measures could be very expensive for the District. The District should not be required to expend funds for this purpose when a safer location for the proposed pipeline is available. Moving the pipeline more than 1500 feet away from the site is a better alternative as it is more cost effective and does not raise safety concerns. Therefore, “Option K” is preferable as both a cost-saving and safety measure.

The DEIR notes that a location such as a school that houses or attracts children is a “sensitive receptor.” (4.3-16, lines 10-16.) This conclusion also supports the choice of “Option L” because the pipeline will be farther from the school.

6. Release Probability and Sensitive Receptors (DEIR 4.7.6 and 4.7-4)

These sections note the proximity of proposed school sites to the proposed pipeline as described above. The DEIR states that some of the reportable gas pipeline incidents have included the following scenarios:

Caused a death or personal injury requiring hospitalization;

Resulted in gas ignition;

Caused estimated damage to the property of the operator or others, of a total of \$5,000 or more. (DEIR 4.7-6, lines 14-22.)

The people who are sensitive to air pollution include children, and schools are considered a sensitive receptor. (DEIR 4.7-4, line 20-4.7-5, line2.)

The potential damage and personal injury to children and adults at a school site weigh heavily in favor of moving the pipeline more than 1500 feet from a school site.

An alternate EIR for a route north of the District should be prepared.

7. MM HAZ-2b Installation of Automatic Shutdown Valves. (DEIR 4.7-38).

An alternate EIR for the route north of the District should be prepared.

Automatic shutdown valves where the pipeline comes within 2,000 feet of a school site should be required.

8. Hazardous Materials Release (DEIR 4.7)

The applicant's proposed pipeline location is within fifty (50) feet of the proposed high school.

"Option I" would realign a portion of Line 407 to place the pipeline outside the 1500-foot buffer zone around a planned high school. (DEIR 4.7-42, lines 2-3.)

"Option J" would realign a portion of Line 407 to place the pipeline outside the 1500-foot buffer zone around a planned high school (PG&E 2009). (DEIR 4.7-42, lines 28-29.)

"Option K" would place the proposed natural gas pipeline outside the 1500-foot buffer for the elementary school. (The applicant proposed pipeline location is approximately 1350 feet from the proposed school boundary.) (DEIR 4.7-43, lines 24-27.)

"Option L" would involve the installation of Line 407, within the 1500-foot buffer of a planned elementary school. (DEIR 4.7.44, lines 33-34)

The installation of methane release sensors should be installed at PG&E expense on each school site within one-half mile of the pipeline. PG&E should be required to work with the County and local fire department to develop an emergency hazardous materials release response action plan.

A school district cannot be located within one-quarter mile of a known emitter of hazardous or acutely hazardous materials unless findings are made that emission levels do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. (See Education Code section 17213.)

A pressure regulating station such as the one which will be located on Baseline Road between Walerga Road and Fiddymont Road (Baseline Road Pressure Regulating Station or "BRS") (See DEIR section 4.10-5, lines 17-18) are potential emitters of hazardous emissions, principally methane, as described in the DEIR section 4.7-4, lines 1-18. As stated therein, leaks may expose sensitive populations to methane. The greatest potential hazard is explosion and fire.

Therefore, the pressure release stations should be more than one-quarter mile from any school site. Additionally, the installation of methane release sensors on each school site within one-half mile of the pipeline should be required. PG&E should be required to work with the

County and local fire department to develop an emergency hazardous materials release response action plan.

9. Schools (DEIR 4.12-7, line 26 to 4.12-9, line 6)

This section is incomplete in that there is no mention made of the Center Joint Unified School District which is located, in part, in Placer County and which will be affected by the proposed pipeline. Further, no mention is made of the current and future population that the District serves or will serve.

Please correct this section to include an accurate description of the District, its schools and current student enrollment. Information on the location of planned schools, the projected enrollment, and the proximity of the schools to the pipeline should also be included.

10. Transportation and Traffic (DEIR 4.13-19, lines 7-13 and 4.13-23, line 31- 4.13-24, line 6.)

There is no "Placer County Unified School District" yet it is referenced in both of these sections as the pertinent school district.

Please correct these references to include the Center Joint Unified School District.

CONCLUSION

The proximity of the proposed high pressure natural gas pipeline is a safety hazard for the District at its planned locations for schools. The location of the gas pipeline should be changed in accordance with identified options which place the pipeline more than 1500 feet from a school site for the safety of the children as well as others who will be at the future school sites. If the pipeline is not relocated, the District will suffer financially by being forced to undertake expensive studies or even find new school sites. Other requirements described herein for the safety of the students should be imposed. The alternative of multiple smaller pipelines to provide service should be considered as well.

The District reserves the right to make additional comments in the event that further environmental analysis is done.

Very truly yours,



Craig Deason
Assistant Superintendent, Facilities
and Operations

CD:cf

bcc: Elizabeth B. Hearey, Esq., Atkinson, Andelson, Loya Ruud & Romo
Michael Winters

MICROP LIMITED
TR MARTIN (MANAGER)
PO BOX 688
WINTERS CA 95694
530-795-2479-OFFICE
530-627-5602-CELL

June 3, 2009

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

I do not agree with the proposed pipeline going through good farm land. Prime agricultural land is being lost around the world and the source of water for irrigating land has been shrinking by 1% per year. Water tables are falling in countries that contain ½ of the world's population, including the three largest grain producers-China, India and the US. Farmers also have the climate changes that impact the food production. Isn't there a possibility running the pipeline Through land that is not producing food (like the foot hills and along the free ways)?

Sincerely,


TR Martin

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County of Yolo

BOARD OF SUPERVISORS

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Woodland, California 95695-1268
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June 12, 2009

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

Re: Draft Environmental Impact Report for PG&E Line 406/407 Natural Gas Pipeline Project
State Clearinghouse No. 2007062091
California State Lands Commission EIR No. 740

Dear Ms. Spurr,

The County of Yolo appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report for PG&E Line 406/407 Natural Gas Pipeline Project dated April 29, 2009. The proposed project involves construction of 40 miles of new pipeline spanning from western Yolo County to the City of Roseville, of which approximately 27 miles would be located in unincorporated Yolo County. The Board of Supervisors understands the necessity to increase and extend natural gas service to residential and commercial customers in Yolo County and the greater Sacramento Valley region. However, we do have comments and concerns with particular details of the proposed project. The county's comments and concerns are as follows:

Project Description

PG&E proposes to use a portion of the Clark Pacific site near the intersection of Best Ranch Road and County Road 100B (APN: 027-050-05) for pipe storage during the construction of Line 407 East and West segments of the project. Clark Pacific received a Use Permit (ZF #2007-078) in April 2008 to conduct their precast concrete business operations. The county requests that PG&E apply for a zone conformance letter with the Planning and Public Works Department to ensure that use of the site for pipe storage is consistent with the existing Use Permit for the property. Additional permits will be required for any grading and construction on the site, and a Use Permit modification may be required if the storage of pipe and estimated truck trips and traffic generation are found to be inconsistent with the Use Permit.

Agricultural Resources

In general, the 27 mile stretch of the project that traverses Yolo County is designated Agriculture in the Yolo County General Plan. Yolo County has a longstanding history of implementing policies to encourage and enhance agricultural production within the county. Thus, the county is concerned that agricultural uses will be limited within the permanent easement. The pipeline is proposed to be constructed with 5 feet of soil coverage in order to allow farming activities such as discing or deep-ripping to continue within the permanent easement. As a result, the Project will limit the future use of approximately 152.81 acres of farmland to row crops, field crops, or crops that do not involve deep rooted plants. Deep rooted crops, such as orchards and vineyards (which are two of Yolo County's leading crops), would not be allowed within 15 feet in either direction of the pipeline centerline. The county disagrees with the analysis in the Draft EIR that

assumes 3.1 acres of orchard is not a significant impact because it can be converted to another type of shallow root crop. It is illogical to assume that it would be practical and profitable to plant row crop or field crop on 3.1 acres in the middle of a mature orchard. Thus, the removal of 3.1 acres of orchard is a significant impact that requires appropriate mitigation.

Biological Resources

PG&E has incorporated several Applicant Proposed Measures (APM) to mitigate for the loss of potential Swainson's hawk nesting and foraging habitat. However, the impact of potentially removing 206 trees within the Project site is of serious concern to the Yolo County Natural Heritage Program. Please contact Maria Wong, Habitat JPA Manager (530-405-4885), well in advance of any plan to remove or disturb trees or vegetation, and before construction of aboveground facilities, to ensure consistency with the Natural Heritage Program and its Swainson's Hawk Interim Mitigation requirements.

Land Use and Planning

After the acquisition of ROW, please submit a clear and detailed map to the Planning and Public Works Department that shows the final route of the natural gas pipeline within Yolo County. The location of the pipeline and permanent easement will be necessary in order to make future land use decisions.

Transportation and Traffic

Yolo County concurs with the minimum cover of 5 feet above the top of pipe for drainages, irrigation canals, and road crossings. However, the Draft EIR does not identify or discuss the proposed parallel distance of the pipeline from the county's right-of-way (ROW). The county requests that the edge of easement for the pipeline be placed at a minimum of 50 feet from the boundary of any existing county easement or ROW. This will ensure that the county can safely complete future road improvements and related excavations, as necessary. In addition, a 100 foot buffer from PG&E's easement to the edge of any bridge or parallel drainage crossing is also requested.

Please refer to the Yolo County Improvement Standards when planning any work within or near road crossings or within the county ROW. Encroachment permits and road closure permits must be obtained from the Public Works Division in advance of any construction within the county's facilities. A Franchise Agreement will also be required. In addition, be advised that trenching and backfilling within the county ROW cannot be completed without observation and confirmation by a county inspector.

For the safety of road crews and the general public, the county also requests that PG&E place well marked, permanent postings at all road and ditch crossings indicating the location of the high pressure gas line.

Conclusion

Thank you for the opportunity to review this environmental document. If you have any questions about the items addressed in this letter, please contact David Morrison, Assistant Director of Planning and Public Works, by e-mail at david.morrison@yolocounty.org or by phone at (530) 666-8041.

Sincerely,



Mike McGowan, Chair
Yolo County Board of Supervisors

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Linda S. Adams
*Secretary for
Environmental
Protection*

California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>



**Arnold
Schwarzenegger**
Governor

9 June 2009

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

Subject: WDID 5A57CR00074 Pacific Gas and Electric Line 406-407 Natural Gas Pipeline

As a Responsible Agency, as defined by CEQA, the Central Valley Regional Water Quality Control Board have reviewed the Draft Environmental Impact Report for the Pacific Gas and Electric (PG&E) Line 406-407 Natural Gas Pipeline (29 April 2009).

PG&E proposes to construct and operate multiple natural gas transmission pipelines that will cross the California Central Valley in Yolo, Sutter, Sacramento, and Placer counties. These projects are necessary in order to provide greater capacity and system reliability for existing gas transmission and distribution pipeline system and to extend service to new customers through the region. PG&E also intends to install the new facilities in an environmentally sensitive manner while locating the pipeline to "minimize the potential of environmental impacts resulting from damage by outside sources."

According to project information obtained from the Draft EIR, this project includes:

- Construction of approximately 40-miles of new 30-inch pipeline that would tie into existing pipelines.
- Construction of new aboveground facilities such as new valve stations and associated extensions, actuators, valve hand wheels, risers, meters, monitoring equipment and other appurtenances.

The new pipeline construction would include the following activities:

- clearing and grading
- trenching and soil stockpiling
- horizontal directional drilling
- hammer boring
- auger boring/jack and boring
- epoxy coating of pipe
- pipeline stringing and welding
- lowering in the pipeline and backfilling
- hydrostatic testing of pipe and pigging

The DEIR identifies over ten alternatives. It does not identify a preferred alternative or an environmentally superior alternative. The Executive Summary for the project states, "...the determination of an environmentally superior alternative is difficult because of the many factors that must be balanced, and none of the alternative options reduce Class I impacts." It goes on to state, "the environmentally superior alternative would be incorporating Alternative Options I and L into the proposed Project alignment. Alternative Option I includes impacts to seasonal wetlands, swales, a vernal pool, and a creek. Alternative Option L has complications with a planned new elementary school and as stated in the ES, "Option L would not reduce the significant and unavoidable impacts associated with the proposed Project..."


Since a specific preferred alternative was not identified in the DEIR, the Central Valley Regional Board is not providing specific project comments for the Draft EIR however; we have determined that this project has the potential to adversely affect water quality and waters of the U.S. and California ("other waters"). The proponent must follow the ACOE 404(b)(1) Guidance to assure approval of their 401 Water Quality Certification application. The guidelines are as follows:

1. **Avoidance** (Is the project the least environmentally damaging *practicable* alternative?)
2. **Minimization** (Does the project minimize any adverse effects to the impacted wetlands?)
3. **Mitigation** (Does the project mitigate to assure a no net loss of functional values?)

The Central Valley Regional Board is requesting the California State Lands Commission consider an alternative that will produce the fewest impacts to state water resources and water quality including avoiding and minimizing impacts to all drainage features, canals, creeks, streams, rivers, vernal pools and other water bodies.

We look forward to receiving additional specific project information in order to process your 401 Water Quality Certification request for this project.

Thank you for the opportunity to comment on the DEIR. If you have any questions or comments regarding the 401 water quality certification program, please contact me at (916) 464-4814.



VIRGINIA MORAN
Environmental Scientist
Water Quality Certification Unit

Cc: Mr. Chris Ellis, Principal Planner, Pacific Gas and Electric Company

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CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Rm. LL40
SACRAMENTO, CA 95821
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PERMITS: (916) 574-0685 FAX: (916) 574-0682



June 10, 2009

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

Dear Ms. Spurr:

State Clearinghouse (SCH) Number: 2007062091
PG&E Line 406/407 Project

Staff for the Department of Water Resources has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board (Formerly known as The Reclamation Board). The Board is required to enforce standards for the construction, maintenance and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

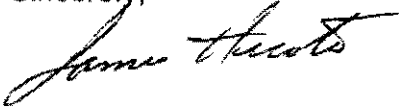
- The placement (including auger boring/Jack-and-boring), construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee(CCR Section 6);
- Existing structures that predate permitting or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6).
- A vegetation plan including, but not limited to the sites, vegetation type (i.e. common and scientific name), number, planting spacing and irrigation method that will be within each project area (CCR Section 131).
- Board jurisdictions include but are not limited to the Sacramento River, Yolo Bypass, Cache Creek, Natomas Cross Canal, Natomas East Main Drainage Canal, Knights Landing Ridge Cut.

The permit application and Title 23 CCR can be found on the Central Valley Flood Protection Board's website at <http://www.cvfpb.ca.gov/>. Contact your local, federal and state agencies, as other permits may apply.

June 10, 2009
Crystal Spurr
Page 2 of 2

If you have any questions please contact me at (916) 574-0651 or by email
jherota@water.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "James Herota", written in a cursive style.

James Herota
Staff Environmental Scientist
Floodway Protection Section
Division of Flood Management

cc:

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

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REMY, THOMAS, MOOSE and MANLEY, LLP

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1944 – 2003

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BRIAN J. PLANT
OF COUNSEL

June 12, 2009

*Via fax: (916) 574-1885
(original to follow by U.S. Mail)*

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

Re: PG&E Line 406-407 Natural Gas Pipeline
SCH No. 2007062091
Comments on CA State Lands Commission Draft EIR No. 740

Dear Ms. Spurr:

We are writing on behalf of the Measure M Group, the proponents of the Sutter Pointe Specific Plan (SPSP) in Sutter County, currently under consideration for approval by the Sutter County Planning Commission and Board of Supervisors. The Measure M Group generally supports the extension of new natural gas pipelines as outlined in the DEIR, as the lines would serve the new urban development planned for the Sutter Pointe Specific Plan area in south Sutter County. However, the Measure M Group has several concerns regarding the assessment of risk to the public and the adequacy of the mitigation measures discussed in the Draft EIR to address such risks resulting from the proposal to construct and operate the new natural gas transmission pipelines. While we recognize that some effort has been made to quantify and address the risks, more can and should be done. The Measure M Group also has concerns about the construction timing and sequencing described in the EIR. As currently presented, we believe the EIR fails to fully comply with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). In the following discussion, we offer specific suggestions for additional or revised mitigation measures that we believe could address our concerns.

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Public Resources Code section 21002 requires agencies to adopt feasible mitigation measures (or feasible environmentally superior alternatives) in order to substantially lessen or avoid the otherwise significant adverse environmental impacts of proposed projects. (Pub. Resources Code, §§ 21002, 21081, subd. (a); CEQA Guidelines, §§ 15002, subd. (a)(3), 15021, subd. (a)(2), 15091, subd. (a)(1).) To effectuate part of this general requirement, EIRs must set forth mitigation measures that decisionmakers can adopt at the findings stage of the planning process. (Pub. Resources Code, § 21100, subd. (b)(3); CEQA Guidelines, §§ 15126, subd. (e), 15126.4.)

Mitigation measures should be capable of: (a) “[a]voiding the impact altogether by not taking a certain action or parts of an action”; (b) “[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation”; (c) “[r]ectifying the impact by repairing, rehabilitating, or restoring the impacted environment”; or (d) “[r]educing or eliminating the impact over time by preservation and maintenance operations during the life of the action.” (CEQA Guidelines, § 15370.)

“An adequate EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible.” (*Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029-1030.)

While an acceptable level of individual risk for hazards associated with underground pipelines has not been established by the State of California or the federal government for new development projects such as the Sutter Pointe Specific Plan, standards have been proposed and used by various governmental agencies worldwide.¹ These standards generally consider individual risk levels below 1×10^{-6} (one-in-a-million) acceptable.

A local community’s tolerance for risk and risk acceptability needs to be taken into consideration in determining a threshold value above which individual risk levels are unacceptable. As mentioned in Item No. 9 below, the Sutter Pointe community has determined the acceptable level of individual risk to be one-in-a-million ($1:1,000,000$ or 1×10^{-6}). Accordingly, any proposal that results in a higher level of risk to the community would be deemed unacceptable by the SPSP community.

Our overarching concern with this DEIR is with the estimated risk from the proposed pipeline ($1:27,000$), which is approximately 60 times greater than the estimated risk that is generally considered acceptable. Unless PG&E is required to take steps to decrease the likelihood of injury or fatalities from a rupture of the proposed pipeline, it is

¹ Cornwell, John B. and Meyer, Mark M., Quest6 Consultants, Inc., *Risk Acceptance Criteria or “How Safe is Safe Enough?”*, October 13, 1997.

reasonable to anticipate that adjoining residential and commercial land uses will be significantly constrained (i.e., that setbacks would be required). While one might be able to site parking lots or streets directly adjacent to the fifty-foot easement line, buildings may have to be set back significantly greater distances (perhaps tens to hundreds of feet). This could severely impact the resulting buildable areas of parcels along the pipeline. This significant issue is explained in more detail in our comments pertaining to specific pages and sections below.

1. Page ES-17, Impact No. HAZ-2: Mitigation measures should be increased to reduce the risk to acceptable levels. See our suggestions in Comment #10, below.
2. Page ES-18, Impact No. LU-1: The DEIR states that the project will not conflict with SPSP; however, the unacceptable level of risk may result in the creation of no-build zones within SPSP – this would be unacceptable to Measure M Owners. (See also pages 4.9-19 through 4.9-23).
3. Page 2-31, Powerline Road Main Line Valve (PRV): The location of this facility isn't clear, but it should be located on the northeastern corner of the intersection of Riego Road and Powerline Road – not southerly of Riego Road.
4. Page 2-50, Giant Garter Snake Construction Scheduling: Several strategies are listed, but they could adversely impact existing rice farming operations. These impacts need to be resolved during right-of-way acquisition proceedings so that landowners can properly anticipate the impacts to their farming operations.
5. Page 2-53, Trenching: The horizontal alignment and vertical profile of the pipeline need to anticipate the future location, depth and size of underground improvements within the SPSP area. The horizontal alignment and vertical profile of the pipeline should be adjusted as needed to allow future construction of the SPSP infrastructure.
6. Page 2-71, Pipe Bouyancy, Line 11: The effect of a higher Factor of Safety would appear to be to "increase," not "decrease," the downward force of backfill acting on the pipe.
7. Page 2-83, Operation, Maintenance, and Safety Controls: This section outlines the proposed monitoring efforts PG&E plans for the pipeline to address its potential impacts over time. Section 2.8.3 sets forth the concept of High Consequence Areas (HCA), which includes the SPSP area. This section talks about a Pipeline Integrity Management Plan. Section 2.8.4 also refers to an Emergency Response Plan. Notwithstanding the attempts in these sections to provide reassurance, a later section of the DEIR reveals that

the level of risk associated with pipeline is unacceptable (see Table 4.7-5 on Page 4.7-33 which shows the annual likelihood of serious injury or fatality to be 1:27,000 for Line 407E (the section of line running through SPSP)). As stated earlier, the generally accepted level of risk is considered to be 1:1,000,000, which is consistent with the SPSP community's risk tolerance.

Also, we were unable to find either of the plans mentioned above in the DEIR. We would appreciate the opportunity for our engineering consultants to review these plans to be sure they adequately address our concerns.

8. Page 3-63, Table 3-3, Sutter County: The description incorrectly characterizes the timing of the widening of Riego Road. We understand that the current estimate is for that work to begin in 2011.

9. Page 4.7-22, Sutter County General Plan: You should be aware that development standards being developed by the Measure M Group and Sutter County relating to the siting and routing of energy facilities within the SPSP area. We refer you to Section 9.5 Dry Utilities (Page 9-18 of the Specific Plan). Specific Plan Policies 9.5-8 through 9.5-11 deal specifically with natural gas facilities. The provisions of Division 15 of the Sutter Pointe Land Use and Development Code (Section XX00-1511) also require compliance with the provisions of the Specific Plan standards. While we understand that the California PUC regulates the design of natural gas facilities (and supersede local codes and regulations), these Specific Plan standards set forth the community's expectations with respect to the location of such facilities, and the level of risk the community is willing to accept. These standards specifically set the risk level at 1:1,000,000, which, as stated earlier, are generally accepted worldwide as the appropriate level of risk for the general public. PG&E's proposal does not come close to meeting these expectations. (See also, Page 4.12-16).

10. Page 4.7-33, Impact HAZ-2, Table 4.7-5: This table indicates the annual likelihood of serious injury or fatality for Line 407E (the section of the pipeline in the SPSP area) at 1:27,000 or 4.93×10^{-5} (a significantly higher level of risk than generally accepted (1:1,000,000)). In fact, the level of risk proposed by PG&E is approximately 60 times greater than the generally accepted level of risk of 1:1,000,000.

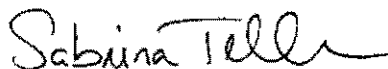
CEQA does not allow an agency to simply declare an impact to be significant and unavoidable without substantial evidence that mitigation to a less than significant level is infeasible. In fact, we believe additional mitigation is quite feasible and should be considered for this project to provide a more acceptable level of risk protection.

Additional mitigation measures could include increasing the wall thickness of the pipe, using a higher grade of pipe, decreasing the hoop stress of the pipeline, providing a greater depth of cover, providing more frequent inspections, increasing the frequency and type of monitoring, better cathodic protection systems, more frequent patrolling and inspections, better line marking efforts, better public education efforts, development of emergency planning and training programs, and providing a better warning to future excavators than simply a buried yellow tape lying in the pipeline trench (for example, providing a concrete cap over the pipe, encasement of the pipe with concrete, encasement of the pipe with a sand envelope, etc.). In the final analysis, the desired level of protection should be one where there is not a need for no-build zones or set-backs of habitable structure and outdoor areas on developable land within SPSP.

Further, we propose that PG&E be required to prepare individual risk assessments for all proposed land uses along the route of the proposed pipelines within the SPSP area, and to develop appropriate mitigation measures that will reduce the risk to the adjacent land uses to mutually agreeable acceptable levels. The Measure M Group, in conjunction with Sutter County, is interested in working with PG&E to address our concerns.

We appreciate your consideration of our comments. We would welcome the opportunity to discuss with you further our concerns about the compatibility of the existing plans and mitigation proposed for the pipeline as they affect the planned development for the SPSP area.

Sincerely,

A handwritten signature in black ink, appearing to read "Sabrina Teller", with a stylized flourish at the end.

Sabrina V. Teller



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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.

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.

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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

Ms. Crystal Spurr
June 12, 2009
Page 6

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.

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.

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\ltr spurr (961209).doc

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DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE

2800 GATEWAY OAKS DRIVE, MS 19

SACRAMENTO, CA 95833

PHONE (916) 274-0635

FAX (916) 263-1796

TTY 711

*Flex your power!
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June 11, 2009

09YOL0017

03-YOL/SUT-Various

Pacific Gas and Electric (PG&E) Line 406/407 Project

Draft Environmental Impact Report

Ms. Crystal Spurr

California State Lands Commission

100 Howe Avenue, Suite 100 South

Sacramento, CA 95825

Dear Ms. Spurr,

Thank you for the opportunity to review and comment on the project's Draft Environmental Impact Report (DEIR). The proposed project includes construction of an approximately 40 mile long, 30 inch diameter natural gas pipeline (Lines 406, 407, and the Powerline Road Distribution Feeder Main) from the Esparto area in Yolo County east to Roseville in Placer County. Six above ground facilities are also proposed to be constructed by the project. The pipeline crosses State Highway System facilities including Interstate 5 (I-5) and State Route (SR) 113 in Yolo County, and SR 99 in Sutter County. Our comments are as follows:

- Any pipeline work to be performed within Caltrans Right of Way will require an Encroachment Permit. For permit assistance please contact Encroachment Permits Central Office at (530) 741-4403.
- A Traffic Management Plan (TMP) should be prepared and submitted for Caltrans review to minimize traffic impacts to the State Highways during construction of the pipeline. The traffic control plan should discuss the expected dates and duration of construction, as well as traffic mitigation measures. We recommend that to the extent possible, the applicant should limit truck trips during morning and evening peak traffic periods (6-9 AM and 3-6 PM) to avoid exacerbating congestion. For TMP assistance, please contact John Holzhauser at (916) 859-7978.

If you have any questions about these comments please do not hesitate to contact Arthur Murray at (916) 274-0616.

Sincerely,

A handwritten signature in black ink that reads "Alyssa Begley".

ALYSSA BEGLEY, Chief

Office of Transportation Planning - South

Ms. Crystal Spurr
June 11, 2009
Page 2

cc: John Holzhauser, D3 Traffic Management Plans
Julio Elvir, D3 Encroachment Permits
Arthur Murray, Transportation Planning South
Sukhvinder Takhar, Transportation Planning
William A. Davis, Transportation Planning

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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.

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

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

June 12, 2009

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.

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.

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.

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.

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.

June 12, 2009

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

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.

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,

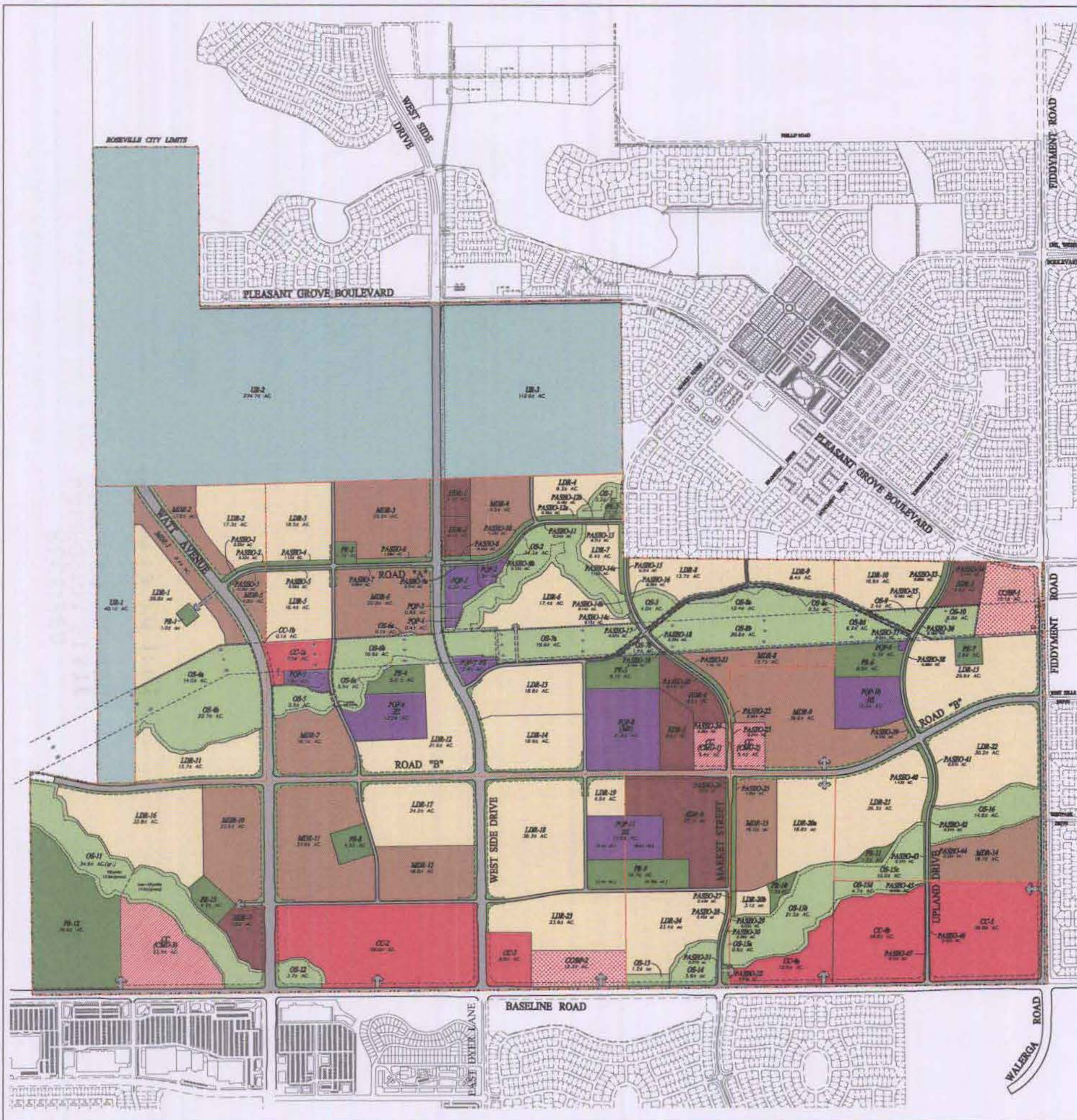
A handwritten signature in black ink, appearing to read 'Jeff Jones', with a stylized, looped flourish at the end.

Jeff Jones

Sierra Vista Project Manager

Enclosure

Cc: City of Roseville




 NORTH
 0 200 400 600
 SCALE: 1" = 400'

LAND USE MAP

Sierra Vista

Scale: 1" = 400' Roseville, California January 22, 2009


 EDAW


 SIERRA VISTA
 COMMUNITIES


 MACKAY & SOMPS
 ENGINEERS PLANNERS SURVEYORS

Sheet 1 of 1

June 10, 2009

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

Via: Email and Regular Mail

spurrc@slc.ca.gov

Subject: PG&E Line 406 and Line 407 Natural Gas Pipeline Project (CSLC EIR 740) (SCH# 2007062091) – Draft EIR Comments

Dear Ms. Spurr:

Thank you for the opportunity to review and comment on the draft EIR for the above referenced natural gas pipeline project. The City of Roseville has reviewed the draft EIR and on June 5, 2009 met with PG&E representatives to discuss City concerns and explore pipeline design options that could serve to reduce potential conflicts with the City's proposed Sierra Vista Specific Plan. As expressed at our June 5th meeting the City has hazard/land use compatibility, design location and aesthetic concerns as discussed below.

Hazard/Land Use Compatibility

The City is currently processing the Sierra Vista Specific Plan (SVSP), an approximately 2,000-acre planning area located adjacent to and north of Baseline Road and the Line 407 alignment, west of Fiddymont Road, and south of the West Roseville Specific Plan area. The Plan includes a mix of housing types totaling nearly 6,655 units, commercial services, schools, parks and open space (see attached land use plan). Based on review of the draft EIR, discussions at our June 5th meeting and PG&E's follow up letter dated June 11, 2009, the City understands that in PG&E's opinion the SVSP planned land uses are compatible with the pipeline project. Because the pipeline has been designed to DOT standards developed for the nation's natural gas pipeline transportation system, the project's safety risk should be identified as acceptable in the final EIR.

Design Location Issues – Potential Conflict with Future City Utilities and Infrastructure

As discussed above, the City is currently processing the SVSP which is located adjacent and north of Baseline Road and the Line 407 East alignment. According to the draft EIR, within Line 407 East Segments 7, 8 and 9 (the Segments adjacent to the SVSP) the pipeline is proposed on the north side of Baseline Road, although the specific alignment and it's proximity to the final road right-of-way is not identified. Additionally, Segment 407 East 8 would include approximately 1,875 feet of HDD-installed pipe. This section would begin approximately 900 feet west of the Baseline Road/Watt Avenue intersection and would also contain the proposed Baseline Road Pressure Regulating Station.

The City's design concerns center on the need to coordinate the pipeline's horizontal and vertical alignment and related above ground facilities with future road alignments, final grades, landscaping, utility and infrastructure needs of the SVSP. These concerns were discussed at the June 5th meeting where the City and PG&E agreed to share design information and work together with the goal of developing compatible facilities. The City requests that the following design issues be considered as part of this ongoing effort:

- The future cover and therefore vertical alignment of the gas line may be influenced by activities associated with the SVSP including mass grading, installation of a future large diameter water

line, and deep foundations for signal poles and other required signal control apparatus planned for Baseline Road. The City is concerned that the proposed 5 feet of cover over the pipeline may not provide enough design flexibility to accommodate SVSP required future improvements. The City recommends installing the pipeline at a depth of 15 feet below existing grade to avoid conflict with future infrastructure needs including underground utilities and earthwork across and on top of the pipeline.

- The City's preference is for the pipeline's horizontal alignment to be located under Baseline Road pavement. This would provide better protection for the line and improve landscape design options within the future Baseline Road landscape easement. Other high pressure gas pipelines in the City have been located under road pavement.
- If the pipeline can not be located under Baseline Road pavement the alignment will need to be coordinated with the SVSP proposed Baseline Road widening so as to optimally site the easement in relation to planned roadside landscaping. This issue was discussed at the June 5th meeting including a concept that would locate the 50-foot pipeline easement immediately adjacent to the ultimate Baseline Road future back of curb. At this location the City's landscape easement would coincide with PG&E's pipeline easement. Within the combined easement the City could locate a Class I bikeway/pedestrian path above the pipeline as well as trees, shrubs and groundcover. As explained at our June 5th meeting, PG&E's design criteria would restrict deep rooted trees within 10 feet of the pipeline centerline. It has come to City staff's attention that at a recent project workshop it was stated that the deep root tree setback criteria was 15 feet on either side of the pipeline. The City feels it can maintain a deep root tree setback criterion of 10 feet and still implement a landscape plan that is comparable with other similar areas using the above approach. However any increase in deep rooted tree setback requirements beyond the 10 feet discussed at our meeting would erode the City's ability to implement an acceptable landscape plan. Should that occur, an alignment under the road pavement would need to be more seriously considered.
- The proposed location of the Baseline Road Pressure Regulating Station (PRS) conflicts with SVSP parcel CC-10. Parcel CC-10 is planned to be a regional shopping center. The City requests that the Baseline Road PRS be relocated westerly to future SVSP parcel OS-13 or other acceptable location (see attached land use plan). At the June 5th meeting it was agreed that SVSP land owner consultants would provide additional information related to this proposed relocation and that PG&E would further evaluate the proposal in relation to proposed HDD work and resource issues. In a subsequent email to the City PG&E indicated that there is some limited potential for adjusting the location of the station but there are issues that need to be addressed before the final location can be confirmed and that PGE is willing to work with the City of Roseville and the Sierra Vista developers to locate a mutually acceptable location once the design parameters firm up. The City looks forward to working closely with PG&E on this issue.
- The proposed underground cluster valve station was also discussed at the June 5th meeting. It was agreed that the City and PG&E would work together to locate this feature so that it is compatible with specific plan development.

Aesthetics

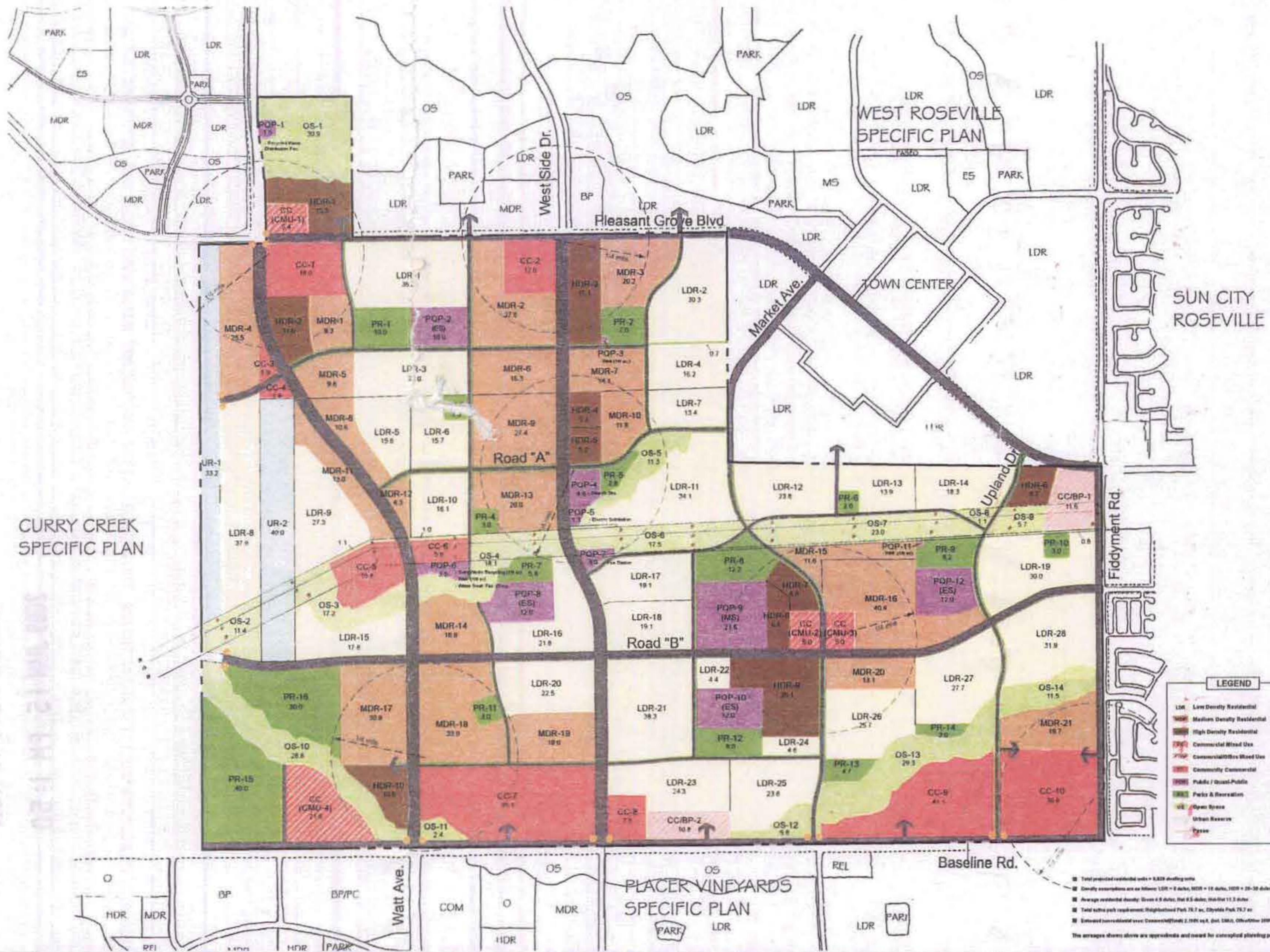
Baseline Road is one of the gateway entrances to the City and with approval of the proposed SVSP will become even more prominent with large commercial centers planned for nearly the entire Baseline Road Frontage. Consistent with other specific plan areas in the City, to ensure high quality and aesthetically pleasing development the design of individual develop projects are required to be consistent with design guidelines approved as part of the specific plan. In addition to private development projects, City projects and utility infrastructure improvements are also subject to these guidelines. While the SVSP design guidelines have not been finalized, the City's design guidelines typically require masonry walls with enhanced decorative columns (stone, brick, etc.) and/or a trim cap and full screening of the enclosed infrastructure. The Hard Rock Substation (located at the Rocky Ridge/Eureka Road intersection) is an example of a prominently located City of Roseville Electric Substation where specific plan design guidelines were applied to the exterior walls. This is the type of design treatment the City would request for pipeline related above ground facilities. In the event that final design for the pipeline project needs to occur prior to approval of the proposed SVSP design

guidelines, the City will work with PG&E to develop a design that is as consistent as possible with any available draft guidelines.

Thank you for your consideration of our comments. Should you have any questions concerning this letter, please contact me at (916) 774-5334.

Sincerely,


Mark Morse
Environmental Coordinator



DATE: 01/22/06

EDAW SIERRA VISTA

SIERRA VISTA SPECIFIC PLAN
Conceptual Land Use Plan

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ALISA J. STEPHENS
8267 S. Lake Circle
Granite Bay, CA 95746
Telephone: (916) 791-2251
Cell: (916) 764-0950

June 3, 2009

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

Re: Pacific Gas and Electric Company (PG&E) Line 406-407 Natural Gas Pipeline

Dear Ms. Spurr:

I am a co-owner of the F.E. Mast farm located at 13990 County Road 88A, Esparto, Yolo County, California 95627. The property is 58.5 acres, consists of two parcels, APN 48-200-04 and 48-200-06, which are bisected by County Road 88A. Our family farmhouse is on the West parcel. There are outbuildings. The farmhouse and outbuildings were built in approximately the 1890's. My Grandfather, Floris E. Mast, purchased the farm in 1924. It has been in the family since then. It is prime agricultural land, typically planted in irrigated row crops, such as tomatoes, sunflowers and alfalfa. It is in the Williamson Act. We have our own agricultural and domestic wells.

Enclosed is a photograph of the route of the proposed pipeline, with our farm outlined in black. As you can see, the pipeline would bisect our two parcels from West to East. **Our primary concern is that this would segment our small farm property, making it less viable as an agricultural enterprise.** The following are our objections to the proposed location of the pipeline, which would cut through our property:

1. The pipeline easement will segment our 58.5 acre farm, making it less viable as an income-producing agricultural enterprise;
2. The pipeline will run through prime agricultural property, causing significant impact to agricultural resources;
3. We intended to plant a vineyard or an orchard on the property in the future. With the proscription against grapes and trees in the easement, our future plans cannot be realized. Several almond orchards have been planted in close proximity to our land in the past few years;
3. The pipeline will be in close proximity to our farmhouse (less than .5 mile), creating an unacceptable hazardous risk of fire, explosion and natural gas leakage into the environment;

4. The pipeline could degrade the groundwater which we use via our wells for agricultural and domestic use;

5. The eucalyptus trees on the North boundary of the property are a habitat for owls and Swainson's hawks, and there are a myriad of other birds on the property: pheasants, Valley quail, redwing blackbirds, magpies and others. Swainson's hawks are a protected species; attached is a map from the USDA Natural Resources Conservation Service showing a concentration of Swainson's hawks on and around our farm. There is no hawk concentration along County Road 16.

In reviewing the EIR, there are several proposed alternate routes that would **minimize segmenting prime farmland. Segmenting prime agricultural land has a significant negative impact on agricultural resources, decreasing the segmented land's viability as an agricultural economic enterprise.** Yolo County's General Plan, adopted on July 17, 1983, sets for the following goal, objective and policy:

"Goal AG-1: Conserve and preserve agricultural lands in Yolo County, especially areas currently farmed or having prime agricultural soils and outside existing planned communities and city limits."

The location of the proposed pipeline does not comply with the General Plan. The pipeline will cause permanent loss of farmland for vineyard and orchard use. Further, Paragraph 4.1.1 of the EIR states:

"The proposed alignment of the pipeline parallels existing county and farm roads to the maximum extent feasible; however, some portions will cross through agricultural lands containing crops."

This statement is untrue! The route of the proposed pipeline in Western Yolo County begins running along Road 17, but then jogs South **and runs directly across prime cropland when it could easily be routed parallel to existing county roads, avoiding cropland.**

With the primary goal being to preserve prime agricultural land in Yolo County, my preferences with respect to the proposed pipeline, are as follows (in order from highest to lesser preferences):

1. **No pipeline;**

2. **Option A.** This would follow existing County Road 16 to I-505. See Figure 3-2B, Map 3. The pipeline would run **along the boundaries of agricultural fields, not through them.** There are almost no structures or trees along CR 16. Under Option A there is only 1 residence located within 200' of the pipeline, whereas 8 residences would be located within 200' of the pipeline for the proposed project. **Option A would cause the least impact on homes and agricultural cropland.**

3. **Option F.** This would following existing CR 17 and then jog North through the Dunnigan Hills. The route would run along CR 17 instead of bisecting fields. See Figure 3-2E, Map 1. **Under Option F no houses would be within 200' of the pipeline.**

4. **Option B.** The route would follow CR 16, and then turn South to cross I-505. See Figure 3-2B, Map 4. **This route results in 2 miles less bisecting agricultural lands.** This is a sparsely populated area and no residences are located within 200' of the proposed pipeline.

5. **Option E.** This route follows existing CR 19, resulting in less bisecting of agricultural land. Three residences would be located within 200' of the proposed pipeline, less than the 5 residences under Option D.


6. **Option D.** This route would shift a nearly 2-mile portion of the pipeline from bisecting 10 agricultural fields located between CR 17 and CR 19 to the agricultural field boundaries along CR 17. It is preferable to locate the pipeline along existing county roads than to bisect fields. The drawback of this option is that the pipeline would be located within 200' of 5 residences.

It is my opinion that the primary factor in deciding the route of the proposed pipeline is to avoid bisecting, and thus segmenting, prime agricultural cropland. Bisecting cropland, vineyards and orchards causes a permanent loss of agricultural resources. Segmenting agricultural parcels, especially small ones such as ours, makes the parcels less viable as an agricultural enterprise.

In looking at PG&E's proposed route, it is clear that it is a "straight shot" through cropland for purposes of keeping its cost as low as possible. Please do not permit that to happen, as there are very viable alternate routes which run along existing county roads, particularly CR 16 which is little used and has only 1 structure and few trees. Aesthetic impact to CR 16 would be de minimus.

Thank you for considering my comments and preferences. Please do not hesitate to contact me if you wish further information.

Very truly yours,



ALISA J. STEPHENS

Encs.

Cc: Ed Mast

Wilma Stephens Hill

Howard and Bonnie Lopez

Yolo County Farm Bureau

PG&E Proposed 406 Pipeline Hungry Hollow, Yolo County Part - SOILS -

Date: 7/16/2007

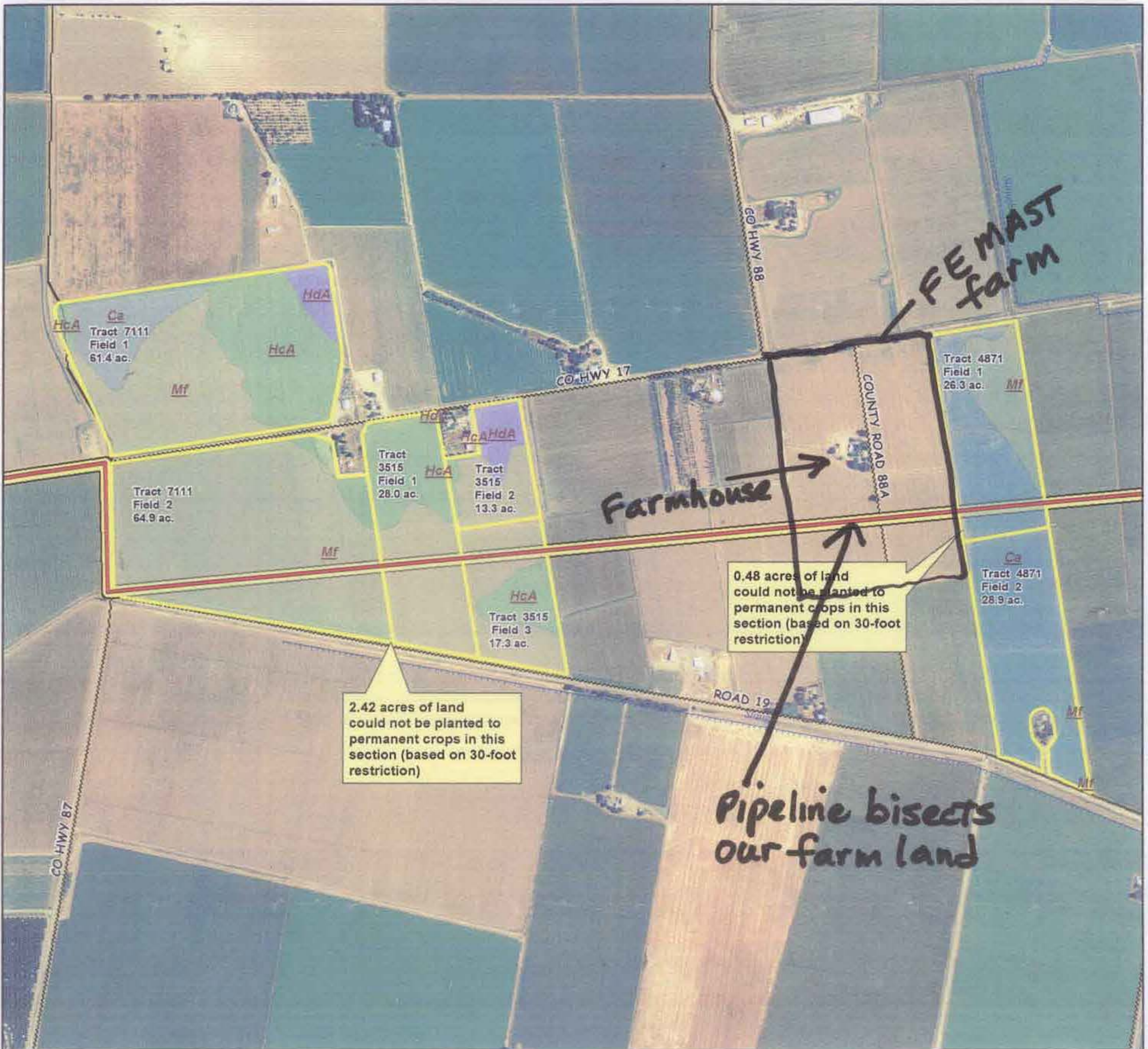
Customer(s): [REDACTED]

District: YOLO COUNTY RESOURCE CONSERVATION DISTRICT

Approximate Acres: 3



Field Office: WOODLAND SERVICE CENTER
Agency: USDA Natural Resources Conservation Service
Assisted By: PHIL HOGAN
State and County: CA, YOLO



Legend

- Howard Lopez 30-foot restriction - 3.0 total acres
- Lopez Properties
- Buffer_of_Line_406_S_Alt_(Hungry_Hollow_Part)_-_29,765_ft_(34 acres)
- Line 406 S. Alt. (Hungry Hollow Part) - 29,765 ft.
- Canals
- Intermittent Streams
- Perennial Streams
- Roads

700 0 700 1,400 2,100 2,800 Feet

Soils Map

MUSYM, MUNAME

- Ca, Capay silty clay
- HcA, Hillgate loam, 0 to 2 percent slopes
- HdA, Hillgate loam, moderately deep, 0 to 2 percent slopes
- Mf, Marvin silty clay loam

N



PG&E Proposed 406 Pipeline Hungry Hollow, Yolo County Part Protected Species

Date: 7/16/2007

District: YOLO COUNTY RESOURCE CONSERVATION DISTRICT

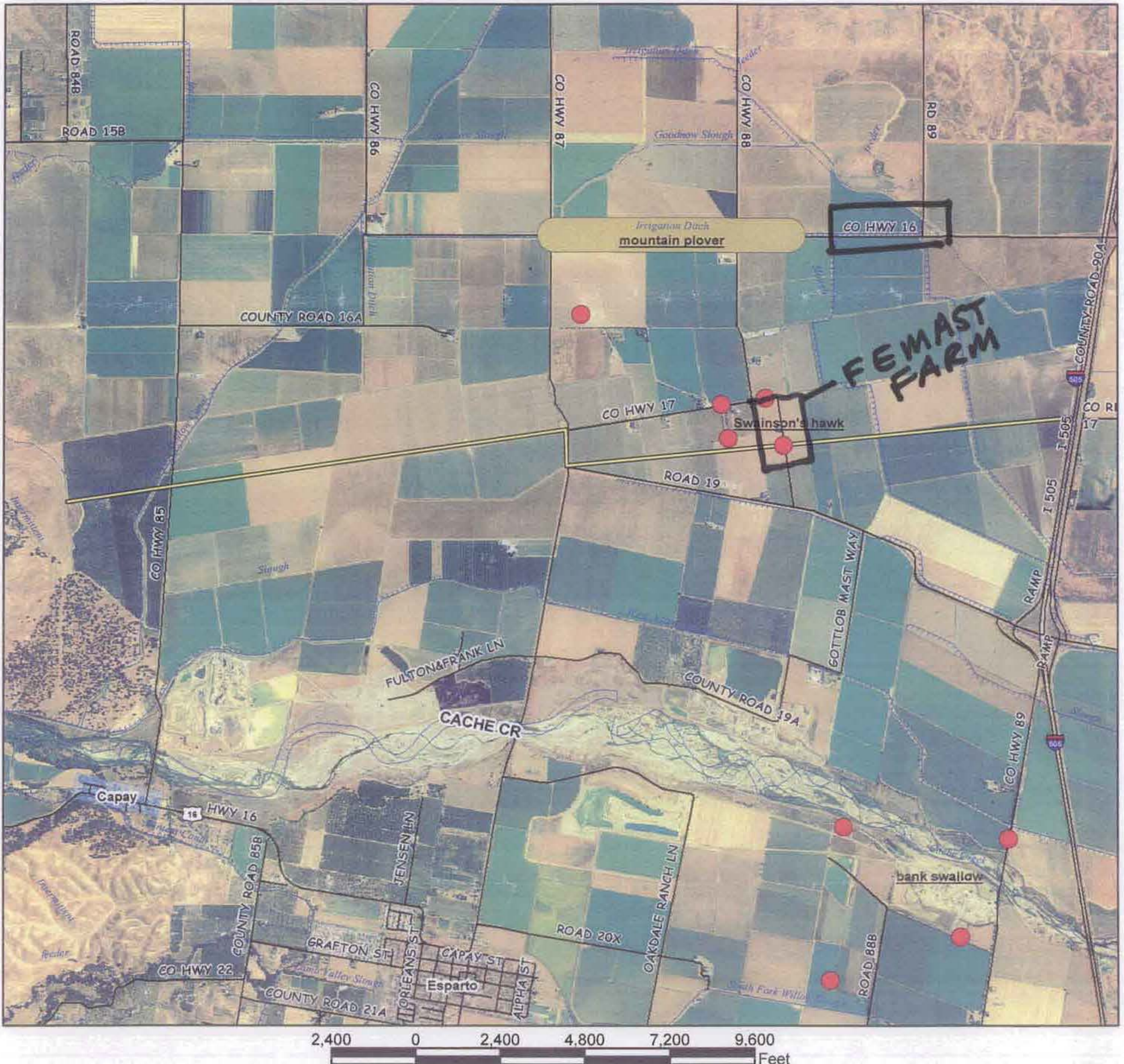
Approximate Acres: 34

**SOURCE: California Natural Diversity Database
California Department of Fish and Game**

Field Office: WOODLAND SERVICE CENTER
Agency: USDA Natural Resources Conservation Service

Assisted By: PHIL HOGAN

State and County: CA, YOLO



Legend

- | <ul style="list-style-type: none"> Buffer_of_Line_406_S_Alt_(Hungry_Hollow_Part) - 29,765_ft (34 acres) Line 406 S. Alt. (Hungry Hollow Part) - 29,765 ft. Canals Intermittent Streams Perennial Streams Roads | <p>Protected Species</p> <table border="0"> <tr> <th>CNAME</th> <th>Town</th> </tr> <tr> <td> Swainson's hawk</td> <td> Capay</td> </tr> <tr> <td> mountain plover</td> <td> Esparto</td> </tr> </table> | CNAME | Town | Swainson's hawk | Capay | mountain plover | Esparto | <p>Unincorporated Towns</p> <table border="0"> <tr> <th>CNAME</th> <th>Town</th> </tr> <tr> <td> Swainson's hawk</td> <td> Capay</td> </tr> <tr> <td> mountain plover</td> <td> Esparto</td> </tr> </table> | CNAME | Town | Swainson's hawk | Capay | mountain plover | Esparto |
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| Swainson's hawk | Capay | | | | | | | | | | | | | |
| mountain plover | Esparto | | | | | | | | | | | | | |

NRCS Natural Resources
Conservation Service

SWAINSON'S HAWK

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David A. Valler, Jr.
Air Pollution Control Officer

June 12, 2009

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
Email: spurrc@slc.ca.gov

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) PACIFIC GAS AND ELECTRIC COMPANY (PG&E) LINE 406-407 NATURAL GAS PIPELINE.

Dear Ms. Spurr,

The Feather River Air Quality Management District (District) appreciates the opportunity to review and comment on the above referenced project. The District commends the commitment made in the DEIR to mitigate the impact to air quality to a less than significant level by using both on-site and off-site measures. The District shall assist the proponent in incorporating all feasible on-site mitigation measures and in determining the amount of off-site mitigation required to fulfill this commitment.

The emissions calculated for the sections 407E, DFM, and 407W provided in Tables 4.3-6, 4.3-7, and 4.3-8 report emissions for the each portion of the project and are not county specific. The District recommends that county specific emissions are calculated due to the differing Significance Thresholds between the four counties.

District staff are available to assist the Lead Agency and Project Proponent as needed. Please contact me at (530) 634-7659 ext 210 for assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sondra Andersson".

Sondra Andersson
Air Quality Planner

Enclosures: None

File: Chron

June 12, 2009

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento CA, 95825
spurrc@slc.ca.gov

**Subject: Draft Environmental Impact Report for PG&E Line 406/407
Natural Gas Pipeline Project (SAC200901335)**

Dear Ms. Spurr,

Thank you for giving the Sacramento Metropolitan Air Quality Management District (SMAQMD) the opportunity to comment on the project known as PG&E Line 406/407 Natural Gas Pipeline Project partially located within the Natomas Joint Vision area of the County of Sacramento along Powerline Road (Line DFM). The District has the following comments on the Draft Environmental Impact Report:

- APM AQ-1 and APM AQ-2 on page 4.3-39 deviates from District standard mitigation for heavy-duty construction vehicles (<http://www.airquality.org/ceqa/StandardConstructionMitigationLanguage.pdf>). The current measures lack oversight. Add the following mitigation measures:
 - For all work done within the SMAQMD, the project shall provide a plan, for approval by the lead agency and SMAQMD, demonstrating that the heavy-duty (> 50 horsepower) self-propelled off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent particulate reduction¹ compared to the most recent CARB fleet average at time of construction; and

The project representative shall submit to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or

¹ Acceptable options for reducing emissions may include use of newer model year engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

- For all work done within the SMAQMD, the project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and the lead agency and SMAQMD shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supersede other SMAQMD or state rules or regulations.

and/or:

If at the time of construction, the SMAQMD has adopted a regulation applicable to construction emissions, compliance with the regulation may completely or partially replace this mitigation. Consultation with SMAQMD prior to construction will be necessary to make this determination.

- Table 4.3-7 located on page 4.3-44 states that construction emissions will exceed the SMAQMD's maximum daily threshold for oxides of nitrogen. However, it appears the maximum daily emissions are estimated for the whole line, and not the portion within the SMAQMD. Please clarify if 348.10 pounds per day is the maximum daily emissions expected to occur within the SMAQMD. If not, an analysis needs to be done to bifurcate emissions released in SMAQMD and emissions released in FRAQMD.
- MM AQ-1b on page 4.3-47 calls for the proponent to "pay a mitigation fee to the respective local air districts to offset NO_x emissions which exceed the applicable

thresholds after all other mitigation measures have been applied." Estimate the fee to be paid to SMAQMD by the proponent. If maximum daily emissions within the SMAQMD exceed 85 pounds of NO_x after mitigation is applied, emissions above the threshold can be offset through an off-site mitigation fee based on the Carl Moyer program cost effectiveness which is currently \$16,000/ton of NO_x. The SMAQMD's fee calculator can be found at <http://www.airquality.org/ceqa/ConstructionEmissionsMitigationFeeCalculator.xls>. If a mitigation fee is not identified in the FEIR, the fee will be determined at the time of construction. All fees must be paid prior to initial ground disturbance.

- On page 7 of the MMP, specifically list the AQ-1b NO_x mitigation measures listed on page 4.3-47.
- PuriNOx fuel is no longer available in the Sacramento Region. Please remove it as a mitigation option.
- SMAQMD applauds the proponent for the applicant proposed measures starting on page 4.3-39. However, APM AQ-11 on page 4.3-40 which states that "Contractors will limit operation on "spare the air" days within each County" while laudable, may be difficult to implement effectively, since there are no goals or standards for limiting operation. Please either elaborate on how operations will be limited or remove the mitigation measure.
- The document provides the results of an analysis of the construction-related CO₂E emissions in Table 4.3-12. For the DFM line which is in the SMAQMD's jurisdiction, the reported emissions are 181.30 MT CO₂E in 2010. In total, including the impacts created in other air districts, the project will generate 2,681.94 MT CO₂E over 4 years. The document seeks to reduce this impact to zero through the purchase of carbon offsets in Mitigation Measure 3. MMAQ3 currently reads "The applicant shall participate in a Carbon Offsets Program with CCAR, CARB or one of the local air districts, and will purchase carbon offsets equivalent to the projected project's GHG emissions to achieve a net zero increase in GHG emission during construction phase."

It's laudatory that the DEIR recognizes this impact and seeks to offset the impact to zero. The SMAQMD is working on a pilot off-site GHG mitigation program, but the program is not operational at this point. The SMAQMD recommends the carbon offsets be purchased through a bona-fide carbon market. We do not believe that CARB currently has such a market. The Climate Action Registry (CAR not CCAR) and the Chicago Climate Exchange have such markets.

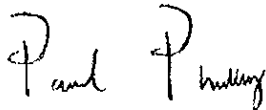
The SMAQMD recommends that the mitigation measure also state by when the fee should be paid. The SMAQMD suggests the following language:

MMAQ-3 GHG Emission Offset Program. The applicant shall participate in a Carbon Offsets Program with CAR, Chicago Climate Exchange or another bona-fide provider of carbon offsets, and will purchase carbon offsets equivalent to the projected project's GHG emissions to achieve a net zero increase in GHG emission during construction phase prior to the beginning of construction.

- This project will be subject to all SMAQMD rules applicable at the time of construction, including but not limited to those identified in attachment 1. Additional information on SMAQMD rules can be found at www.airquality.org or by calling the Compliance Assistance Hotline at (916) 874-4884.

SMAQMD staff thanks the State Lands Commission for the opportunity to present our comments and any questions may be sent to me at pphilley@airquality.org or by calling (916) 874-4882.

Sincerely,

A handwritten signature in cursive script that reads "Paul Philley".

Paul Philley
Assistant Air Quality Planner / Analyst

C: Larry Robinson, Program Coordinator, SMAQMD
Sondra Anderson, Air Quality Planner II, FRAQMD

Attachments:

- 1) SMAQMD Rules & Regulations Statement

Attachment 1: **SMAQMD Rules & Regulations Statement** (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

Rule 417: Wood Burning Appliances. Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.



June 12, 2009

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

Subject: Pacific Gas and Electric Company Line 406-407 Natural Gas Pipeline - DEIR comments

Dear Ms. Spurr,

The Yolo-Solano Air Quality Management District (District) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the above referenced project. The DEIR evaluates the potential environmental consequences from project construction and operations. In short, the project involves trenching, horizontal directional drilling, and construction and installation of approximately 40 miles of new natural gas pipeline spanning the four counties of Yolo, Sacramento, Sutter, and Placer including the construction of six above-ground facilities for pipeline maintenance and operational purposes.

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. This includes pollutants with regional impacts such as ozone, as well as pollutants with more localized impacts such as particulate matter (PM) and Hazardous Air Pollutants (HAPs). While the District has jurisdiction over stationary sources, a majority of air pollution in the region comes from vehicles, which are regulated by the State and Federal government. Since the District lacks direct authority over vehicles, the most effective tools for reducing vehicle emissions at the local level lay in the hands of local land use decision-makers. As a commenting agency under the California Environmental Quality Act, the District has reviewed the DEIR and is submitting the following comments:

1. Section 2.0 – Project Description, Page 2-74, Blow-Down and Purging Procedure, Lines 29-32: The DEIR states that "Data from PG&E's Department of Meteorological Sciences would be used in coordination with the SMAQMD, YSAQMD, PCAPCD, and FRAQMD to determine dates when air quality constraints would be minimal." Please provide clarification as to what conditions PG&E would qualify as an air quality constraint (i.e. Spare the Air day or some other activity).
2. Section 4.3 – Air Quality, Page 4.3-5, Table 4.3-1: This table should be modified to reflect the United States Environmental Protection Agency's (EPA) recent designation for

the District as “partial non-attainment” for Particulate Matter sized 2.5 microns or less in diameter (PM_{2.5}).

3. Section 4.3 – Air Quality, Page 4.3-6, Lines 26-28: This paragraph should be revised to include the EPA’s recent “partial nonattainment” designation of the District for PM_{2.5}.
4. Section 4.3 – Air Quality, Page 4.3-26, Lines 5-7: The Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan (Plan) was adopted by the various air district boards during January and February 2009. The California Air Resources Board (ARB) adopted the Plan in March 2009. Please revise the paragraph to reflect the most recent information regarding the processing/status of the Plan.
5. Section 4.3 – Air Quality, Page 4.3-26, Lines 12-15: The lines should be revised to include the EPA’s recent “partial nonattainment” designation of the District for PM_{2.5}.
6. Section 4.3 – Air Quality, Page 4.3-37, Table 4.3-4: Please amend the table to reflect the current District NOx, ROG, and PM₁₀ significance thresholds as shown in Table 1 of the District’s *Handbook for Assessing and Mitigating Air Quality Impacts* (adopted July 11, 2007). This handbook can be accessed on the District’s website at <http://www.ysaqmd.org/documents/CEQAHandbook2007.pdf>
7. Section 4.3 – Air Quality, Page 4.3-40, Lines 3-4: The Applicant Proposed Measure (APM) AQ-5, addresses minimizing equipment and vehicle idling time to five minutes. The five-minute idling limit is a state requirement and is therefore not considered a means of mitigation.
8. Section 4.3 – Air Quality, Page 4.3-43, Table 4.3-5 and Table 4.3-8: Please amend the tables to reflect the current District NOx, ROG, and PM₁₀ significance thresholds as shown in Table 1 of the District’s *Handbook for Assessing and Mitigating Air Quality Impacts* (adopted July 11, 2007). The link to the District handbook can be found in comment 6.
9. Section 7.0 – Mitigation Monitoring Program, Table 7-2, APM AQ-1 through APM AQ-11 and AQ-1 through AQ-3: Please correct the acronym used for the District to read YSAQMD, not YSAWMD.
10. Appendix D – Air Quality Analysis, Page 3: The District’s current significance thresholds for NOx and ROG are not expressed in a pounds per day unit. The air quality analysis should be revised so that impacts to air quality are evaluated against the District’s significance thresholds as described in the July 2007 version of the District’s *Handbook for Assessing and Mitigating Air Quality Impacts*. The link to the District’s handbook can be found in comment 6.

Page 14, Table 8: Daily Construction Emissions for Line 406 (2009) shows the incorrect significance threshold for the District. Please amend accordingly using the District's current thresholds which can be found at the link provided in comment 6. Additionally, the District would like clarification as to where the emission numbers from the Grading – Dunnigan Hills activity can be found in the included URBEMIS outputs.

Page 16, Table 10: The construction emissions resulting from the 407W activities should be compared to the District's thresholds, not just to Feather River Air Quality Management District (FRAQMD) thresholds.

11. Appendix D – Air Quality Analysis, URBEMIS output, Section 407W: One of the assumptions included for this portion of the pipeline construction included a "Fugitive level of dust = Low" selection. The District would like clarification as to the reason for the "low" selection (perhaps based on the presence of the water truck to limit fugitive dust during construction, which is also listed in the assumptions).

Additionally, the District was unable to locate any other off-road equipment used for construction of the 407W section other than the water truck. This is a discrepancy when compared to the off-road equipment selected for the 406 and 407E sections. Moreover, cut and fill activities are indicated yet it does not appear that equipment capable of conducting those activities is listed in the equipment list. Please clarify.

12. The District understands the difficulty in compiling the data for the emissions due to the complexity of the project and its expanse through four counties, however, the District would like the consultant to provide more clarity in the location of the emissions outputs used from each of the models when inputting the data into the respective line section (406, 407W) tables.

On behalf of the District, thank you for the opportunity to comment on the proposed project. If information in this letter requires clarification, please call me at (530) 757-3668. We look forward to working with you on the project.

Sincerely,



Matt Jones
Supervising Air Quality Planner

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June 12, 2009

Ms. Crystal Spurr, Project Manager
California State Lands Commission (CSLC)
Division of Environmental Planning and Management
100 Howe Street, Suite 100-South
Sacramento, CA 95825-8202

Subject: Comments on PG&E Line 406/407 Natural Gas Pipeline Draft EIR (DEIR)

Dear Ms. Spurr:

The following are PG&E's comments regarding the DEIR.

EXECUTIVE SUMMARY

Clarification of Temporary Use Area

Page ES-2, lines 13-15

The DEIR accurately reflects the temporary use area (TUA) requirements for construction of the 30-inch pipeline on lines 9-13. However, it then goes on to state: "A 60-foot wide TUA would be used for construction in constricted workspaces and would require that excavated soil be transported to an adjacent TUA." (DEIR, p. ES-2, lines 13-15.) While PG&E recognizes that the TUA may be reduced due to lack of available space or environmental constraints, such restrictions should be made on a site-specific basis, rather than making a blanket assumption that the TUA would be reduced to 60 feet, since unnecessarily constricting the workspace will result in a longer duration of impacts. Therefore, PG&E proposes that the quoted language be deleted.

HDD Locations

Page ES-2, lines 15-17

HDD equipment will be set up at the entry points in the temporary use areas. At the exit points, no additional temporary use area is required. PG&E will be able to keep all equipment at the exit points within the right-of-way and temporary construction easement (i.e., TUA). Therefore, PG&E suggests the following change:

"Each of the twelve proposed Horizontal Directional Drilling (HDD) locations would require an additional 18,750-square-foot temporary use area for equipment that would be set up at the proposed entry ~~and exit~~ points."

Alternatives to Proposed Project

Page ES-4, lines 21-23

The DEIR explains why the Line 406 central alternative was eliminated from further analysis, but it does not include a number of reasons that render this alternative unsuitable. PG&E suggests that this language be modified as follows:

Line 406 alternative was eliminated from further analysis because this proposed pipeline alternative alignment would be longer than the preferred alternative (resulting in greater impacts) and would require crossing a greater amount of potential foraging habitat for Swainson's hawk, nesting habitat for burrowing owls,

and other habitats utilized by special-status species. These alternatives would also require construction along sidehills, which would present additional engineering, construction, and maintenance considerations parallel an ephemeral stream passing through natural habitats to CR-14A.

Environmentally Superior Alternative

Page ES-31, lines 29-31

The DEIR contains confusing language regarding the environmentally superior alternative. Although it recognizes that under the No Project Alternative, PG&E may not be able to provide reliable service to its customers, it concludes that the No Project alternative is the environmentally superior alternative." (DEIR, p. ES-31, lines 29-31.) However, on the following page, it states: "The environmentally superior alternative would be incorporating Alternative Options I and L into the proposed Project alignment." (DEIR, p. ES-32, lines 25-26.)

The No Project Alternative would render PG&E unable to comply with its public utility obligations to provide natural gas service to its customers and would trigger the construction of other projects. (See, e.g., section 451 of the Public Utilities Code, which provides: "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities . . . as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.") Therefore, PG&E proposes to modify the DEIR as follows:

The No Project alternative would not result in any of the impacts associated with the proposed Project. Therefore, the No Project alternative is considered the environmentally superior alternative. However, the No Project Alternative would not meet the Project objectives because PG&E would be unable to meet its public utility obligations to provide natural gas service to its customers in accordance with the California Public Utilities Code and associated orders, rules, and tariffs.

SECTION 1.0. INTRODUCTION

Purpose and Scope of EIR

Page 1-4, lines 1-23

In this section, the DEIR identifies the role of other agencies with jurisdiction over various aspects of the Project. However, it omits any reference to the California Public Utilities Commission (CPUC), which has exclusive jurisdiction over the design and construction of the pipeline. PG&E proposes that the paragraph starting on line 21 be modified to reflect the CPUC's jurisdiction:

The California Public Utilities Commission (CPUC) has exclusive jurisdiction over the design and construction of the pipeline. The proposed Project would also require approvals and/or review by a number of Federal, State, and local agencies as noted in Section 1.4 - Permits, Approvals and Regulatory Requirements. However, as a CPUC-regulated public utility, PG&E is not subject to local land use and zoning regulations, and no local discretionary permits are required for the Project.

Efficient and Cost-Effective Planning

Page 1-3, lines 4-5

PG&E suggests the following modification to correct an error in the description of the new pipeline referenced on lines 4-5:

... transmission pipeline that extends from Lines 400 and 401 and travels in a north-south east-west direction paralleling County Road (CR) 85 near Esparto to Line 172A ...

Permits, Approvals, and Regulatory Requirements

Page 1-8, lines 28-29

To clarify what other permits are required for the Project, PG&E requests the following modifications:

As a CPUC-regulated public utility, PG&E is not subject to local land use and zoning regulations, and local discretionary permits are not required for the Project. However, In addition to action by the CSLC, the proposed Project may will require permits or approvals from the following reviewing authorities and regulatory agencies:

Permits, Approvals, and Regulatory Requirements

Page 1-9, line 13

PG&E is not required to get local reclamation district permits. Therefore, the last bullet point on page 1-9 should be deleted.

SECTION 2.0. PROJECT DESCRIPTION

Wall Thickness and Grades

Page 2-16, lines 2-9

PG&E proposes the following changes to accurately reflect the design of the pipeline system.

"The proposed pipeline traverses several different class locations, requiring different wall thicknesses and grades of steel pipe (~~Grade X-60~~) designed for a Maximum Allowable Operating Pressure (MAOP) of 975 pounds per square inch gauge (psig). The 10-inch DFM would be designed for a MAOP of ~~500 psig to~~ 975 psig. Industry standards for pipeline sections installed via Horizontal Directional Drill (HDD) technology ~~require a pipe diameter to wall thickness ratio (D/t) of 50 or below. Refer to Table 2-2 for pipe wall thickness specifications required in each class location.~~"

Depths to Cover

Page 2-17, Table 2-1

The proposed depth of the Sacramento River crossing is 80 feet. Therefore, Table 2-1 needs to be corrected to reflect a 35 to 80 proposed depth in the last row on the table (Water Crossings).

Pipeline General Area Class Specifications

Page 2-18, Table 2-2

PG&E has identified the following errors in the DFM column in Table 2-2:

- The proposed grade of the 10-inch DFM is 52,000, not 60,000.
- The seam type for the 10-inch DFM is Electric Resistance Welded (ERW), not DSAW.
- The percent SMYS at MAOP of the 10-inch DFM is 40.3, not 40.

Aboveground Facilities

Page 2-31, line 18

The DEIR needs to be corrected to accurately reflect the fact that the Yolo Junction Pressure Limiting Station will be ten feet in height, not five feet as stated in the DEIR.

Pipeline Right of Way

Page 2-37, lines 1-3; Figures 2-9 and 2-10

The DEIR correctly describes the 100-foot wide temporary use area (TUA) for the 30-inch pipeline segments. However, the 60-foot wide TUA referenced on the top of page 2-37 should refer to the 10-inch pipeline segments for distribution feeder mains (DFM), not constricted workspaces. Constricted work spaces should be determined on a site-specific basis. Therefore, PG&E suggests the following modifications:

A 60-foot wide TUA would be used for construction of the 10-inch pipeline segments for the distribution feeder mains in constricted workspaces and would require that excavated soil be transported to an adjacent TUA (see Figure 2-10)."

In addition, Figure 2-9 should be labeled as the configuration for the 30-inch pipeline construction right-of-way. Figure 2-10 should be labeled as the configuration for the 10-inch DFM pipeline construction right-of-way.

Typo

Page 2-37, line 15

Change the term "DMF" to "DFM."

Planting in the Right-of-Way

**Page ES-2, line 19; Page 2-16, line 27;
Page 2-37, line 20; Page 4.1-14, line 4
Page 4.2-22, line 32; Page 4.2-24, line 29**

PG&E requests that the DEIR be corrected to reflect PG&E's current policy to prohibit planting of deep-rooted plants with 10 feet of the pipeline centerline, not 15 feet as stated in the above-referenced portions of the DEIR.

Staging Areas

Page 2-37, line 26

The DEIR correctly reflects the fact that the primary staging areas will be in existing industrial and commercial yards. PG&E requests the following modification to the DEIR plans to clarify that staging areas along the Project ROW will be within the 100-foot TUA.

Staging areas along the Project right-of-way would be within the TUA—would generally be approximately 300 feet by 200 feet.

Agency Representative at Meeting

Page 2-49, line 8-9

PG&E requests that the following modification be made to reflect the fact that there will be different types of meetings with various participants.

Also, PG&E would hold ~~a~~-preconstruction meetings with ~~between~~ permitting entities and the construction crews.

Protective Coatings

Page 2-55, lines 21-22

PG&E requests that the referenced language be modified as follows to allow the use of protective coatings other than epoxy.

The pipe sections would be welded together, x-rayed, and a protective abrasion resistant coating epoxy applied to the joints.

Horizontal Directional Drilling

Page 2-55, lines 31-33

The DEIR states: "The Project pipeline would be installed a minimum of 60 feet underneath the bed and banks of any navigable water body and a minimum of 35 feet below any other feature to be crossed by HDD technology." However, it is unclear which crossings are considered by CSLC to be navigable waterways. PG&E requests that the language in the DEIR be modified as follows:

The Project pipeline would be installed ~~a minimum of 60 feet underneath the bed and banks of any navigable water body and a minimum of 35 feet below any other~~ water feature to be crossed by HDD technology.

Pipe Buoyancy

Page 2-71, lines 16-18

The DEIR contains information previously provided by PG&E regarding its design to control buoyancy in the Yolo bypass. However, since that time, PG&E has progressed with its buoyancy control design. PG&E requests the following revision of the language to reflect the new design:

To address the potential for scour within the Yolo Bypass, cover would be increased from 5 feet to 7 feet. A slurry backfill will be placed in the ditch around the pipeline to a depth of 2 feet above the pipeline (5 feet below grade). The slurry will have a minimum weight of 120/lbs/cubic foot to provide the required downward force to prevent buoyancy. a concrete coating would be applied to provide a downward force of 10 lbs/ft or 2-inch minimum thickness whichever is greater (PG&E 2008).

Construction Schedule

Page 2-80, lines 11-23

PG&E suggests that the information regarding the construction schedule be updated as follows:

Construction of Line 406 would begin as soon as all agency approvals have been obtained in September or October 2009 with the targeted proposed in-service date scheduled for November February 2010. The Line 407 East, Line 407 West, and DFM segments would may be constructed in two different phases as dictated by the

added load on the transmission system. ~~Current projections are that Phase 1, consisting of Line 407 East and the DFM, would be constructed in May 2010 with an in-service date of September 2010. However, PG&E acknowledges that Phase 1 installation may need to occur in advance, as early as 2009, of several road improvement projects associated with developments along Baseline Road and Riego Road. Phase 2, consisting of Line 407 West, is projected to be required in 2012. Construction of the Line 407 segments is projected to begin in 2012 but may be required earlier depending upon load growth in the area.~~

Construction would typically occur between 6:00 a.m. and 6:00 p.m., Monday through Saturday, except for the HDD operations, tie-ins, and hydrostatic testing, which may occur around the clock. . . . "

GPS Coordinates

Page 2-83, lines 9-12

The DEIR reflects information contained in PG&E's application that indicates that PG&E will take GPS coordinates at all pipe welds. Since submitting the application, however, PG&E has refined its GPS plans and requests that the referenced language be modified as follows:

. . . PG&E would take Global Positioning System (GPS) coordinates periodically along the route and tie the as-built pipeline drawings back to the original survey. Locations with GPS coordinates include tie-ins, angle points, HDD entry and exits points, class location changes, and wall thickness and pipe grade changes at the locations of all pipe welds in order to maintain an accurate location of the proposed pipeline once it is in the ground.

High Consequence Area

Page 2-84, lines 28-34

The DEIR discusses the steps that must be taken where a pipeline is within a High Consequence Area (HCA). The Department of Transportation regulations (49 CFR 192, Subpart O) sets forth two methods for determining HCAs, and PG&E has utilized method 2 to identify potential HCAs along the Project route. One potential HCA exists along Line 407E at 3700 Riego Rd, Elverta CA (Western Wood Fabricators) and one is confirmed at the Baseline Road Pressure Regulating Station (BRS). Therefore, PG&E suggests that the DEIR be modified as follows:

Operators are also required to devote additional efforts and analysis in HCAs to ensure the integrity of the pipelines. A potential HCA exists along Line 407 East and one HCA is confirmed at Fiddymont Road. The portions of the Project within Class 3 areas, including Line 407 East and the Powerline Road DFM, would be within an HCA. When HCAs are confirmed, or as population density creates new HCAs, those ~~Certain~~ portions of the Project would be required to be included in PG&E's Pipeline Integrity Management Plan, which provides for the assessment and mitigation of pipeline risks in an effort to reduce both the

SECTION 4.2 AGRICULTURAL RESOURCES

County Designated Compatible Williamson Act Land Uses

Page 4.2-19, lines 1-8

As a CPUC-regulated public utility, PG&E is not subject to local land use and zoning regulations, and PG&E is not required to obtain local discretionary permits, including minor

use permits referenced in this paragraph. The first paragraph on page 4.2-19 is in error and should be deleted.

SECTION 4.3 AIR QUALITY

Spare the Air Days

Page 4.3-40, lines 19-20 (AMP AQ-11)

To clarify steps that PG&E will take on "spare the air days," PG&E suggests that this provision be modified as follows:

On "spare the air" days within each County, PG&E will enact measures to promote carpooling by Project employees and limiting emissions and equipment operation that does not otherwise impede Project progress. Contractors will limit operation on "spare the air" days within each County.

Greenhouse Gases (GHGs)

Page 4.3-49 to 4.3-52

The DEIR acknowledges that "[t]he CLSC does not currently have a defined threshold of significance for climate change or GHG emission impacts." (DEIR, p. 4.3-37, lines 17-18.) It calculates the GHG impacts associated with construction and operation of the pipeline (primarily worker vehicles and construction equipment). While it concludes that the operational impacts are "less than significant" (DEIR, p. 4.3-51, line 10), it directs PG&E to purchase carbon offsets equivalent to the project's GHG emissions during construction to achieve a net zero increase. (DEIR, p. 4.3-52, lines 6-10, MM AQ-3.) This analysis regarding the GHG impacts associated with construction is flawed in three ways.

First, the calculation of GHG emissions does not take into account that PG&E's fleet meets new CARB standards for vehicle emissions. As a result, the GHG impacts associated with vehicle use during construction are overstated, and it is unclear whether the proposed mitigation would apply to projected or actual impacts.

Second, although the DEIR acknowledges PG&E's participation in three programs designed to reduce climate change impacts (DEIR, pp. 4.3-49, lines 16-28), it completely ignores the impact of these programs.

Third, there is no basis for the CSLC's assumption that the impacts must be mitigated to achieve a "net zero" impact. The California Public Utilities Commission, which has primary jurisdiction over the design and construction of public utility projects, has not adopted this standard. Moreover, CEQA authorizes a lead agency to impose mitigation only to "substantially lessen or avoid significant impacts on the environment." (CEQA Guidelines, §15041(a).) If an impact is not significant, there is no authority to mitigate.

PG&E understands that there is currently uncertainty among state agencies as to the appropriate way to deal with GHG emissions before CARB's GHG programs are fully implemented. However, PG&E suggests that CSLC adopt the same kind of approach it uses for other environmental impacts. Specifically, it should: (1) calculate the GHG impacts before mitigation measures are applied; (2) calculate the impacts after mitigation; and (3) determine whether those impacts are significant. If not, no additional mitigation should be required. If so, additional mitigation would be appropriate to reduce those impacts to a less than significant level -- not to reduce the impacts to zero.

SECTION 4.4 BIOLOGICAL RESOURCES

Dwarf Downingia Status

Page 4.4-21, line 17-18

PG&E suggests the following modification to the referenced language to reflect the listing status for dwarf downingia:

Dwarf downingia (*Downingia pusilla*), a CNPS List 2 species ~~strict endemic of the vernal pool hydrologic regime~~, is a strict endemic of the vernal pool hydrologic regime ~~and an annual member of the bellflower family (*Campanulaceae*)~~.

Presence of Fairy Shrimp

Page 4.4-26 and 4.4-27 (Table 4.4-3)

The DEIR erroneously concludes that fairy shrimp “(*Branchinecta lynchi*) was not found during any of the wet season surveys and is presumed absent from the project site.” In fact, *Branchinecta lynchi* was present in two wetland features during wet season surveys conducted in 2007-2008. In addition, unidentified *Branchinecta sp.* eggs were present in several features during the dry season surveys. Therefore, *B. lynchi* is assumed present in the project area, and the above language should be modified accordingly.

Local Conservation Plans and Policies

Pages 4.4-55, 4.4-86, and 4.4-91

As a CPUC-regulated public utility, PG&E is not subject to local land use and zoning regulations. Therefore, the EIR should be modified as follows to reflect the proper jurisdictional status of various local agencies:

Page 4.4-55, lines 5-8.

Local conservation plans and policies are included below. County General Plan goals, policies, and objectives were also evaluated in preparation of this DEIR; however, due to their length they are appended to this DEIR (see Appendix E-14). Although PG&E is not subject to local conservation plans, these plans and policies are taken into consideration in evaluating Project impacts and mitigation measures.

Page 4.4-86, lines 9-13

A qualified ecologist shall dictate the following procedures to ensure that they will be consistent with ~~applicable local jurisdiction requirements, such as County Tree Ordinances, and with any additional permit conditions imposed by the local agency as well as~~ CDFG and other state or federal agencies.

Page 4.4-91, lines 4-6

At that time, a report shall be submitted to ~~the local jurisdiction, and~~ CDFG, if requested, summarizing the results.

Vegetation Clearing

Pages 4.4-81, 4.4-85, and 4.4-94

The DEIR requires that vegetation be cleared only from areas scheduled for immediate construction work (within 10 days). The intent of the 10-day restriction for clearing vegetation is not entirely clear, but PG&E surmises that it is to minimize the potential for

erosion, sedimentation, and the spread of invasive weeds that could result if soil is left barren for an undue length of time. This risk would only occur during the rainy/wet season. Since most vegetation clearing will take place during the dry season, PG&E suggests that this measure only be applicable for work that may occur during the wet season. In addition, vegetation clearing is often necessary more than 10 days prior to construction. Therefore, PG&E proposes the following modification to replace the 10-day limit with a 30-day limit and to restrict its applicability to the typical wet season of November through April.

Page 4.4-81, lines 22-25

Vegetation clearing and/or installation of mats shall be conducted only from areas scheduled for immediate construction work (within 30 40 days) and only for the width needed for active construction activities. The 30-day requirement only applies in the wet season (November through April).

Page 4.4-85, lines 26-27

Existing vegetation shall be cleared only from areas scheduled for immediate construction work (within 30 40 days). The 30-day requirement only applies in the wet season (November through April).

Page 4.4-94, lines 10-12

Existing vegetation shall be cleared only from areas scheduled for immediate construction work (within 30 40 days) and only for the width needed for completion of activities within each active construction area activities. The 30-day requirement only applies in the wet season (November through April).

Wetland Avoidance and Restoration

Pages 4.4-81 to 4.4-83 (MM BIO-1a)

Several of the mitigation measures require flagging, mapping, and/or fencing of sensitive resources found within or near the work areas. In PG&E's experience, it is often more effective and safer for the resource to flag or fence the edge of the limit of work area at an Environmentally Sensitive Zone rather than flag or fence the resource itself. This approach actually causes less resource or buffer area disturbance. We recommend clarifying the following portions of the DEIR to specify that either the resource or the limits of the work area be flagged and fenced in the areas where avoidable resources are to be protected. In addition, since the USACE has determined that active rice fields are considered jurisdictional wetlands, a number of these measures should apply to the natural area wetlands, but would not be appropriate for cropped wetlands or rice fields. To address these issues, PG&E recommends the following clarifications:

Page 4.4-81, lines 6-7

Maximum avoidance of jurisdictional wetlands as determined in consultation with USACE and RWQCB by fencing either the wetlands and appropriate buffer zones that can be avoided or the limits of the work area adjacent to those areas to ensure that no inadvertent encroachment occurs into these areas.

Page 4.4-81, lines 10-11

Consultation with the USACE and RWQCB for any unavoidable wetland impacts, obtaining the appropriate permits, and implementation of the conditions of those permits.

Page 4.4-81, line 16, through page 4.4-82, line 5

Avoidance will consist of fencing any the wetlands that are to be avoided within the ROW, including appropriate buffer zones, to minimize impacts to wetland vegetation types. If construction work areas and/or associated overland travel in wetlands in a saturated or ponded condition is unavoidable, all equipment, vehicles and associated construction materials shall be placed on protective mats to avoid soil compaction, such that they do not make direct contact with the wetland. This requirement is not intended for use in dry soils, where the risk of compaction is low. Vegetation clearing and/or installation of mats shall be conducted only from areas scheduled for immediate construction work (within 30 40 days) and only for the width needed for completion of activities within each active construction area activities. The 30-day requirement only applies in the wet season (November through April). Mats are not required for work in cropped areas (e.g., rice fields). Mats shall be removed immediately following completion of activities within each active construction area. During pipeline construction, the 12 inches of topsoil shall be salvaged (or less where topsoil is less than 12 inches deep), stored in an upland location, and replaced wherever the pipeline is trenched in wetlands. Prior to permit issuance and final design, project construction plans shall depict appropriate measures for topsoil protection and storage that will allow survival of existing seed within the topsoil. Topsoil shall be placed at the surface on top of fill material and not be used to backfill the trench, and excavated trench spoils or excess fill shall be placed on top of the pipeline under topsoil and not dispersed onto the surface of the ROW. Implementation of these measures prior to and during construction will be supervised and verified by the Environmental Monitor (see APM BIO-6).

Page 4.4-82, Lines 21-23

A discussion demonstrating how maximum practicable avoidance has been accomplished and why the wetlands proposed to be impacted cannot be avoided.

Page 4.4-82, Lines 24-30

Methods proposed for restoring the affected wetlands, including topsoil preservation (inclusive of restoration of an impermeable layer, i.e., hardpan, if approved) and backfilling, soil and grade preparation such that there is no change in pre-construction contours, regionally native seed and/or plant materials to be used and installation methods, and maintenance measures, including weed control (does not apply to rice fields and cropped wetlands).

Page 4.4-82, Lines 31-32

Minimum 1:1 replacement ratio (in-kind in-land, on-site) for area and function of temporarily damaged wetland areas.

Page 4.4-83, lines 1-7

A minimum five-year monitoring program with detailed success criteria regarding species cover, species composition, species diversity, wetland area and depth as compared with pre-construction conditions documented prior to construction by a qualified biologist such that the function of the affected wetland and hydrology is fully restored, the methods and results of which shall be described in the Plan. (These measures and the monitoring program below do not apply to work in rice fields or other cropped wetlands, since those will be returned to their agricultural crops.)

Page 4.4-83, Lines 17-21

Detailed contingency measures in case of restoration failure, as determined by the responsible agencies following the five-year monitoring period, requiring additional off-site wetland creation at a minimum ratio of 2:1 for created wetland acreage or as otherwise determined in the USACE 404 and RWQCB 401 water quality certification.

Riparian Avoidance and Restoration

Pages 4.4-85 to 4.4-87 (MM BIO-1c)

PG&E recommends the following modifications to reflect the fencing practices discussed above in BIO-1a, and to clarify that plants used in restoration efforts should be compatible with preconstruction conditions. (Pre-construction conditions may include undesirable non-native species, and therefore matching those conditions will not always be appropriate.)

Page 4.4-85, lines 5-6

Fencing limits of work where riparian vegetation is adjacent to work areas to prevent impacts

Page 4.4-85, lines 11-13

Riparian habitat within the ROW shall be identified by a qualified ecologist; mapped on construction plans; and where avoidable, fenced prior to construction/

Page 4.4-86, lines 31-32

Proposed native tree and shrub species that are compatible with pre-construction conditions.

Rare Plant Avoidance

Pages 4.4-120 (MM BIO-5)

PG&E suggests the following modifications to be consistent with the fencing practices discussed above:

Lines 13-14

~~Flagging, mapping, and fencing to protect any special status plant species within the 200-foot-wide study area during construction.~~

Lines 26-31

Any rare plant species within the study area (including the 100 foot-wide right-of-way and a 50 foot-wide buffer zone on each side of the right-of-way, work areas, staging areas, and/or launcher/receiver stations) will be flagged, and accurately mapped on

construction plans, and fenced along the edge of the construction working limits to protect the area occupied by the species during construction, per APM BIO-3.

Vernal Pools and Swales

Page 4.4-79, lines 25-28

PG&E has committed to avoiding all vernal pools and swales during construction by using HDD or bore crossing methods to install the pipeline under these features, or by narrowing the ROW to avoid these features. Direct surface impacts to vernal pools or swales are not anticipated to result from clearing, grading, or trenching activities. Therefore, PG&E suggests deleting the reference to vernal pools and swales as follows:

... however, ~~several vernal pools and swales~~ and numerous seasonal wetlands, riparian wetlands, and other jurisdictional water features would be disturbed by trenching during project construction.

Review of Grading Permit

Page 4.4-84, lines 1-3

As PG&E is not required to obtain discretionary local permits, including grading permits, from county agencies, although it is required to obtain ministerial grading permits. Therefore, the referenced language should be modified as follows:

Prior to construction, responsible agencies (including the RWQCB, CDFG, and ~~USACE, and County agencies~~) shall evaluate soil and grade restoration measures to be implemented along the ROW.

Invasive Species Control Program

Page 4.4-93, lines 19-21 (MM BIO-3)

PG&E agrees and commits to ensuring that vehicles used in pipeline construction off maintained roads will be cleaned prior to being used on the project, and again if taken from the project for use off-road prior to returning to the project. However, the requirements for vehicle steam-cleaning at each county border are impractical and unnecessary. There are no existing steam cleaning stations set up at these borders, nor would it be necessary or helpful to re-clean vehicles for instance at the Sacramento/Yolo County border where similar vegetation and crops are found to either side of the border, and vehicles will be moving continuously along the ROW across that border. Therefore, MM BIO-3 should be modified as follows:

Prior to Project initiation, all construction equipment shall ~~be steam cleaned before the equipment crosses any county border~~ to remove potential soil and/or water-borne contaminants before the equipment comes onto the Project and again if the equipment is used off-road before returning to the Project.

Typo

Page 4.4-93, lines 33-35

The referenced provision should be modified as follows:

Weed management procedures will be developed and implemented to monitor and control the spread of ~~week~~ weed populations along the pipeline.

Weed-free Certification

Page 4.4-94, lines 7-9 (MM BIO-3)

In MM BIO-3, the DEIR requires: "Fill material, soil amendments, gravel, etc. required for construction/restoration activities on land shall be obtained from a source that can certify the soil as being 'weed free.'" This mitigation measure is not feasible. There are no existing weed-free certification programs for soil or gravel, other than nursery potting soil. Since fill material will be from on-site re-use of excavated soils, coming from soil stockpiled for a given area, this measure is not needed nor practical, since the existing soils are not weed-free and should therefore be deleted.

Valley Elderberry Longhorn Beetle

Page 4.4-102, lines 1-7 (MM BIO-4a)

MM BIO-4a identifies mitigation measures to avoid or reduce impacts to the Valley Elderberry Longhorn Beetle. However, because this issue will be addressed in the permit from the U.S. Fish and Wildlife Service, PG&E suggests that the DEIR be modified as follows to allow PG&E and USFWS to determine the exact buffer zones that will be required in Temporary Use Areas. In addition, the proposed changes to the fencing requirements will be consistent with mitigation measure BIO-1a, discussed above, regarding wetland avoidance.

Elderberry shrubs shall be avoided to the greatest extent feasible. According to the Conservation Guidelines for the Valley Elderberry Longhorn Beetle (USFWS 1999), complete avoidance is assumed when a 100-foot (or wider) buffer is established and maintained around elderberry shrubs. PG&E's biological surveys indicate that the pipeline route will not come closer than 30 feet to any elderberry shrub, and the buffer zones in Temporary Use Areas will be coordinated with the U.S. Fish and Wildlife Service. For all shrubs that would be avoided, the following measures are required:

1. Buffer areas for elderberry shrubs will be fenced along the edge of construction work limits. The fencing shall be located in buffer zones coordinated with the USFWS. Protective fencing shall be erected around each elderberry shrub that would be avoided. The fencing shall be located no greater than 100 feet from the greatest dripline of the shrub.

Swainson's Hawk Monitoring

Page 4.4-104, lines 8-13

The DEIR requires construction to be halted within 0.25 miles of any nesting Swainson's hawks until the young have fledged. PG&E will obtain an Incidental Take Permit under section 2081 of the Fish and Game Code from the CDFG that will cover the potential for incidental take of Swainson's hawk. Therefore, PG&E suggests that the language be replaced as follows:

If nesting Swainson's hawks are found, project activities within 0.5 0.25 miles of the project, PG&E will implement any necessary protection measures as required by the CDFG in the Section 2081 Incidental Take Permit, to prevent nest abandonment or forced fledging as a result of Project activities will be delayed until the young have fledged. Swainson's hawk nest sites within 0.5 mile of active construction will be monitored by a qualified biologist to evaluate whether the construction activities are disturbing nesting hawks.

Construction Windows in Mitigation Lands**Page 4.4-105, lines 1-3 (MM BIO-4b)****Page 4.4-105, lines 10-12 (MM BIO-4b)****Page 4.4-105, lines 15-17 (MM BIO-4c)****Page 4.4-105, lines 26-29 (MM BIO-4c)**

The DEIR limits construction activity in the Natomas Basin mitigation lands and the Sacramento River Ranch Conservation Bank mitigation lands to the period November through February when Swainson's hawk is not present. However, construction within giant garter snake habitat is limited to the period between May 1 and October 1. (DEIR, page 4.4-68, lines 6-9.) Since the two habitats may overlap, PG&E cannot possibly comply with the construction windows for both species. However, reverting to Alternative Option H, as suggested on page 4.4-105, lines 10-12 and 26-29, is not a viable option and may even increase impacts to Swainson's hawks and other nesting birds; as noted on page ES-10, Option H would result in an increase in the number of trees, wetlands, and riparian woodlands that would be impacted.

Because mitigation for the protection of nesting Swainson's hawks is addressed in MM BIO-4a, the construction windows for Swainson's hawk is unnecessary and requests that the provisions in MM BIO-4b and MM BIO-4c referenced above be deleted.

Rare Plant Avoidance**Page 4.4-120, lines 15-17 (MM BIO-5)**

PG&E is not doing any roadway construction as part of this project. Therefore, the following bullet is confusing and should be deleted.

~~Limiting all proposed roadway construction to the existing roadway surface(s) where adjacent special-status plant species occur.~~

SECTION 4.5 CULTURAL RESOURCES**Area of Potential Effect****Pages 4.5-4 through 4.5-39**

This section of the DEIR repeatedly uses the phrase "Area of Potential Effect." This is a term that is typically seen in documents referring to the National Historic Preservation Act term. To be consistent with other CEQA documents, PG&E recommends using the phrase Project Area or Study Area instead. Following are specific cites to places in the DEIR that use this language:

page 4.5-4, line 5

page 4.5-8, lines 20-21

page 4.5-21, line 31

page 4.5-22, lines 10, 13- 14, 17

page 4.5-23, line 33

page 4.5-24, line 16

page 4.5-25, line 15

page 4.5-28, line 24

page 4.5-35, line 31

page 4.5-36, line 5

page 4.5-39, line 4

Cultural Resource Studies**Page 4-5.1, line 10**

This section states that three separate cultural resources studies were completed for the project, but it goes on to list six different studies. PG&E recommends changing the word "Three" to "Several" at the beginning of line 10.

Field Surveys

Page 4.5-3, lines 21-29

This section of the DEIR discusses pedestrian field surveys, but it does not address how sites were recorded. PG&E suggests the following revisions to provide a more complete and accurate description of the process:

All of the field surveys were conducted by qualified archaeologists meeting the Secretary of the Interior's Standards. Newly recorded resources were documented on California Department of Parks and Recreation form DPR 523 (1998), following Instructions for Recording Historical Resources (Office of Historic Preservation 1995). Any previously documented cultural resources within or immediately adjacent to the Project study area Area of Potential Effects (APE) were revisited during the surveys to confirm their locations and assess their present status. In some cases, the sites had been destroyed by modern development; in other instances, they were found not to extend into the Project area. Existing site records were updated on California Department of Parks and Recreation form DPR 523, as necessary. If existing documentation was adequate, or if the resources had been previously evaluated, the resource record was not updated. Historic linear features were recorded only if they possessed integrity; such features lacking integrity (such as modern roads overlain on historic-period roads, or upgraded power lines and railroad grades) or destroyed altogether were not recorded. Ten new site records were created for ten buildings recorded during the architectural survey."

Public Consultation

Page 4.5-11, line 16, to page 4.5-12, line 3

This section regarding public consultation appears to be misplaced in the Results section; PG&E suggests that it be moved to the methodology section.

Eagle Hotel

Page 4.5-36, lines 13-19 (APM CR-3)

PG&E suggests the following modifications to this language to provide more specific information regarding the geo-archaeological study and monitoring activities:

PG&E will complete a geo-archaeological study of areas identified as sensitive for buried resources, as well as backhoe testing at test the reported location of the historic Eagle Hotel, and other areas identified as sensitive for buried archaeological remains identified by a geo-archaeologist, prior to construction by backhoe trenching. All trenching will be supervised by a qualified professional archaeologist and/or geo-archaeologist. If the study is not completed by construction, an archaeologist will monitor any ground disturbing activities in these areas. If resources any-buried materials are identified during either the geo-archaeological study or during construction uncovered, work will stop temporarily at that location, until a qualified archaeologist the monitor can assess the find and determine the appropriate action.

Impacts to Paleontological Resources

Page 4.5-40 and 4.5-41

In the Project Description of the DEIR, it states that CSLC has identified mitigation measures throughout section 4 that are "required to reduce potentially significant impacts to less than significant levels." (Page 2-81, lines 4-5.) In most cases, the DEIR states that the mitigation measures would reduce the impacts to less than significant. However, in the cultural

resources section, the DEIR does not make an explicit statement to that effect. This oversight can be corrected by adding the following clarifying language:

Page 4.5-40, lines 20-21 (PALEO-1)

... These tasks would enhance subsequent evaluation and curation by the chosen repository. With incorporation of MM PALEO-1, impacts to potential resources would be less than significant.

4.5-41, lines 25-26 (PALEO-2)

... be properly curated and available to present and future generations of research scientists and students. With incorporation of MM PALEO-2, impacts to potential resources would be less than significant.

Impacts to Unknown Cultural Resources

Page 4.5-43, lines 5-21 (MM CR-1)

PG&E has already surveyed most of the alternatives where it had access. In addition, implementation of APMs CR-1 through CR-5 clearly identify steps to be taken if any unknown resources are identified. Therefore, PG&E suggests the following revisions to MM CR-1:

Alternative Option Pre-Construction Cultural Resource Surveys. If an Alternative Option becomes the preferred route, to To ensure protection of undiscovered cultural resources, pedestrian field surveys will be conducted for areas all Alternative Options that were not included in the original field survey efforts. The surveys will be conducted by qualified archaeologists meeting the Secretary of the Interior's Standards and utilizing appropriate transect intervals, typically 15 to 20 meters, walked in a zigzag pattern to ensure complete coverage of the Alternative Options Area of Potential Effects (APE). Previously recorded cultural resources located within or immediately adjacent to the Alternative's APE would be re-located and their current condition described and recorded on Department of Parks and Recreation (DPR) update forms. Any previously unknown cultural resources discovered during the course of the Alternative Options surveys would be evaluated for historic significance if the resource will be impacted by the Project and recorded on appropriate DPR forms. In cases where significant impacts would be unavoidable, resource specific, appropriate mitigation would be required to reduce these impacts to less than significant levels as described in APMs CR-1 through CR-5.

Impacts of Alternatives

**Page 4.5-43, lines 22-23; page 4.5-44, lines 3-4
page 4.5-45, lines 25-26; page 4.5-47, lines 3-4
page 4.5-47, lines 19-20; page 4.5-48, Table 4.5-2**

On page 4.5-43 line 5, the DEIR describes pre-construction surveys to be conducted for all alternative options not already surveyed, and concludes that with implementation of the APMs and CR-1, the impact for Options would be less than significant (page 4.5-42, line 29). The DEIR concludes that the cultural resource impacts of Options A, B, D, E, and H would be greater than under the proposed project. However, the basis for this conclusion is unclear since surveys have not been conducted for these options. The DEIR also indicates that Options F, I, and J would have fewer cultural/historic impacts than for the proposed Project. However, since the proposed Project does not have any known cultural resources

impacts after mitigation, it is unclear why these three options would have even fewer impacts. PG&E recommends that the referenced statements be deleted and that Table 4.5-2 be updated to reflect these changes.

SECTION 4.6 GEOLOGY AND SOILS

Earthquake Faults

Page 4.6-39, line 3, to page 4.6-40, line 8 (MM GEO-1)

The DEIR acknowledges that the pipeline is not in designated earthquake fault zones (page 4.6-23, lines 24-27) and that the area has a historic record of low to moderate seismicity (page 4.6-39, lines 4-5). However, Mitigation Measure GEO-1 would require further seismic field investigations to evaluate surface fault rupture hazard and the development of a computer model to evaluate pipeline design. The DEIR overlooks the fact that the CPUC has sole and exclusive jurisdiction over pipeline design standards. Moreover, the requirement for further field studies appears to be based on a misunderstanding of the potential surface impacts of these types of faults. The main seismic design concerns for this pipeline are potential stresses due to traveling wave effects and potential strains due to liquefaction-induced permanent ground displacements, not displacement on buried faults at depth.

The DEIR notes that Willows fault is not considered "active" or even "potentially active." (See page 4.6-23, lines 1-5.) It also notes that the Dunnigan Hills and Great Valley faults do not reach the surface. (Page 4.6-38, lines 23-25.) As such, these faults, at most, would be associated with broad tilting of the land surface rather than discrete surface fault rupture. Modern pipelines are designed to withstand such distributed deformation, and further field investigations is unlikely to yield any benefit.

As stated elsewhere in the DEIR (page 4.6-23, lines 19-27), and illustrated on Figure 4.6-4, the ground shaking hazard for the pipeline alignment is based on the probability of earthquakes on all faults in the region, not the three faults crossed by the pipeline. Any pipeline route proposed in this area would experience similar ground shaking hazard. Therefore, PG&E proposes the following changes to the language in Impact GEO-1, Mitigation Measure GEO-1, and the supporting rationale to specify the type of analysis that should be performed:

Due to the regional tectonic setting ~~proposed pipeline crossing of the three faults~~, the Project area is subject to ground shaking due to earthquakes. Historically, the area has experienced a low to moderate seismicity. The Project could be exposed to ground motion due to a seismic event or any resulting phenomenon such as liquefaction or settlement that could substantially damage structural components.

MM GEO-1 Site Specific Seismic Analysis ~~Field Investigation~~

To determine the traveling wave effects PG&E will develop calculations for the pipe bending stresses due to traveling seismic waves in long straight runs of the pipeline using industry accepted procedures (American Lifelines Alliance "Guidelines for the Design of Buried Steel Pipe", PRCI "Guidelines for the Seismic Design and Assessment of Natural Gas and Liquid Hydrocarbon Pipelines, and ASCE, "Guidelines for the Seismic Design of Oil and Gas Pipeline Systems").

To determine the effect of liquefaction, PG&E will undertake buried pipeline deformation analysis to assess the effects of liquefaction-induced permanent ground displacements for various scenarios. The various scenarios will be dependent on soil conditions and depth of cover, pipe-soil spring properties, amplitude and distribution of the ground displacement profile due to liquefaction and the location of any significant geometry change features along the alignment in the areas of interest. The maximum pipe tension and compression strains developed in the analysis models will be compared to appropriate strain limits (PRCI, "Guidelines for the Seismic Design and Assessment of Natural Gas and Liquid Hydrocarbon Pipelines") to develop a demand vs. capacity assessment.

If the analysis yields results below the designed pipelines specified minimum yield strength, the analysis will be summarized and concluded. If the stresses are above the SMYS, further review will be required. Further review may include reviewing the current pipeline design criteria or performing further site-specific seismic field investigations.

~~PG&E shall perform a site-specific seismic field investigation as part of its detailed design phase for the proposed Project. The field investigation would determine whether any engineering/design solutions are needed to mitigate against any hazards of seismic displacements along the fault crossings. If the field investigation determines the presence of any active faults in project location, then the following shall be completed:~~

~~PG&E shall determine the engineering/design solutions that are appropriate to mitigate against the hazard of seismic displacements along any active faults.~~

~~PG&E shall develop a computer model to determine the soil-pipe interaction with the proposed applied displacement. The model would evaluate various combinations of pipe wall thickness and pipe grade to determine which pattern yields the best performance under displacement conditions. The design shall also incorporate additional methods as necessary.~~

~~PG&E shall design the proposed pipelines and any other proposed facilities using industry CPUC standards for seismic-resistant design in liquefaction-prone areas.~~

~~PG&E shall provide a copy of the final design, as well as any related geotechnical information, to the CSLC before construction of the proposed Project.~~

~~A certified engineering geologist shall observe the construction excavation in the vicinity of the fault crossings to verify the presence or absence of surface deformation that the design assumptions are valid and the design measures (if any) are centered in the correct location.~~

Rationale for Mitigation

~~The seismic field investigation would determine whether engineering/design solutions are needed to mitigate against any hazards of seismic displacements along the fault crossings. Any necessary Standard industry design features would ensure strength and ductility of the pipeline facilities in order to reduce the potential impacts associated with displacement caused by surface faulting and liquefaction.~~

Typo

Page 4.6-5, line 25

... feature created by the displacement of this unit extends to within less than ~~then~~ 2 miles of. . .

Typo

Page 4.6-19, lines 13-14

... these stresses cause strain to build up in the earth's crust ~~crust~~ until enough strain has built up to exceed the strength along a fault and cause ~~ease~~ a brittle fracture. The slip . . .

Typo

Page D.4.6-23, line 7

... discontinuous tonal ~~total~~ lineaments near the base of the northeast-facing escarpment of . . .

SECTION 4.7 HAZARDS AND HAZARDOUS MATERIALS

System Safety

Pages 4.7-32 to 4.7-37 (MM HAZ-2)

The DEIR uses a statistical approach to analyze the potential impact of serious injury and fatalities due to project upset, but the accuracy of the results is highly dependent on the underlying assumptions. PG&E has contracted for an independent review of the DEIR's System Safety and Risk of Upset Report, which is attached as Appendix A. This report finds that the CSLC's risk assessment to be generally credible, but it identifies some data inconsistencies and some statements that appear to be in error. PG&E suggests that CSLC and its consultant review the attached report and rerun the risk calculations on Table 4.7-5 to reflect these comments.

The DEIR references a protocol developed by the California Department of Education to perform a risk assessment for schools to evaluate the risk associated with PG&E's Project. (DEIR, page 4.7-32, lines 16-17.) However, this approach is not widely accepted in the pipeline industry because it is not suited for use with a linear facility. The Office of Pipeline Safety, Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA), which has primary jurisdiction over safety standards for pipelines, uses a population density approach to establish design standards. PG&E has designed the Project to meet federal standards and strongly believes that those standards are sufficient to ensure public safety.

In addition, the DEIR uses DOT reportable incidents to determine the frequency rate of various types of incidents. (DEIR page 4.7-6, lines 8-30.) However, this approach does not adequately take into account the specific attributes of the proposed project. Incidents reported to the DOT include all types and vintages of transmission pipelines. Advances in construction materials and techniques, such as modern coatings and radiographic inspection of welding, as well as improvements in cathodic protection monitoring and integrity management plans, render PG&E's proposed project much less susceptible to risk. While the DEIR recognizes the advantages of modern pipelines, it is not adequately reflected in the calculation of risk. In the absence of data sufficient to quantify the difference in incident frequencies based upon pipeline attributes, it would fall to reason that the proposed modern pipeline would far exceed the national average for incident rates of 1×10^{-5}

fatalities per mile year. Yet the result of the study is 6.1×10^{-5} , which is roughly 6 times greater than the national average.

For example, in addition to the pipeline inspection frequencies listed in Table 4.7-7, PG&E will install remote monitoring of cathodic protection potentials at approximately one-mile intervals along the route. This will provide real time data of the cathodic protection system and allow for a timely response to make corrections. This application of technology is very recent. The risk of incident due to corrosion utilized in the DEIR's analysis should be significantly reduced when applied to the proposed project since the vast majority of the pipelines in the data set would not have remote CP monitoring capability.

Determining High Consequence Area

Pages 4.7-14 and 4.7-15

PG&E requests that the DEIR be clarified as follows to reflect that PG&E has adopted method two for determining High Consequence Areas:

Page 4.7-14, lines 13-14

The HCAs may be defined in one of two ways. Both methods are prescribed by 49 CFR 192.903. PG&E adopts method two (Potential Impact Circle) as its chosen method for determining HCAs in relation to its transmission system.

Page 4.7-15, lines 6-7

In the second method (PG&E's adopted method), an HCA includes any area within a potential impact circle that contains:

Pipeline Design Requirements

Page 4.7-18, lines 10-20

As a CPUC-regulated public utility, PG&E must comply with state and federal pipeline design requirements and is not bound by other guidelines. Therefore, PG&E requests that the above-referenced language be deleted from the DEIR.

Emergency Plans

Page 4.7-31 (MM HAZ-1)

As written, this mitigation measure would require clearing 25 feet outside of the permanent right-of-way and the temporary use area. In addition, minor corrections need to be made to the referenced operational stations. PG&E recommends correcting this mitigation measure as follows:

Lines 11-13

Maintain all areas clear of vegetation and other flammable materials for at least a ~~50~~ 25-foot-radius of any welding or grinding operations, or the use of an open flame.

Line 27-29

Require the contractor to use dedicated fire watch during all hot work within the existing operational stations (e.g., Concord Capay or Sacramento Yolo Station).

Pipe Grade

Page 4.7-36, lines 9-12

The DEIR should be corrected as follows to reflect the correct pipe grade:

... A large proportion of the proposed pipeline would consist of 0.375-inch-wall thickness steel pipe (Grade X-60-65) designed for a Maximum Allowable Operating Pressure (MAOP) of 975 pounds per square inch gauge (psig). . . .

Corrosion Mitigation

Page 4.7-37, lines 12-17 (MM HAZ-2a)

PG&E strongly disagrees with the requirement to perform a baseline smart pig inspection within the first six months of placing the pipeline into operation. PG&E's Integrity Management plan, in full compliance with the State of California's General Order 112E and 49 CFR Part 192.921 Subpart O, states that newly installed pipe that are HCA's or newly identified HCA's must be scheduled for assessment within 10 years from the date the pipe is installed or the new HCA identified. For new pipe, a post-installation pressure test per subpart J of 192 should be used as the baseline assessment. Therefore, PG&E proposes the following modification;

PG&E shall prepare and implement an Operation and Maintenance Plan in accordance with the requirements in Title 49 CFR part 192. The plan shall include a post installation pressure test per 192 subpart J ~~Within the first 6 months of placing the pipeline into operation, PG&E shall conduct a baseline internal inspection with a high resolution instrument (smart pig) of the pipeline in order to obtain baseline data for the pipeline.~~

Corrosion Mitigation

Page 4.7-37, lines 18-23 (MM HAZ-2a)

PG&E takes exception to this section of MM HAZ-2a as it relates to baseline inspections and intervals. The DEIR's proposed inspection requirements are unwarranted under the federal law cited by the DEIR in their request for ILI inspections. Additionally, by focusing limited state authorized funding for discretionary pipeline inspections on our newest pipeline, the DEIR's proposal will have the unintended consequence of increasing risk on the rest of our transmission system.

The proposed requirements are unwarranted because there is no requirement in the cited 49 CFR Part 192 to perform regular subpart O assessments of pipelines in non HCA areas. There is no requirement in 49 CFR Part 192 to perform assessments of HCA area piping within 6 months of identification of an HCA. There is no requirement in 49 CFR Part 192 to perform an assessment within 6 months of another assessment (PG&E's pressure testing of the line prior to placing it into service will meet the assessment requirements of 49 CFR Part 192) It is a violation of 49 CFR Part 192 to select an assessment technology for HCA assessments without regard for the potential threats as the DEIR proposes. 49 CFR §192.921 requires "An operator to select the methods best suited to address the threats identified to the covered segment."

Only a few very small areas around the proposed pipelines meet the requirements of high consequence areas as defined by 49 CFR §192.903 method 2. Other inspections of this pipeline are discretionary. Non-mandatory inspections of at risk lines are authorized by the state through a program that focuses on the most at risk pipelines within the PG&E system. The program funding is also authorized by the state, but it is not unlimited. These brand new line pipelines are clearly and obviously not the most at risk lines within the PG&E system. By

using the limited funding available for non mandatory inspections to assess brand new pipelines, the DEIR is increasing the risk of failure for older, more at risk pipelines.

Installation of Automatic Shutdown Valves

Page 4.7-38, lines 10-20 (MM HAZ-2b)

The proposed mitigation measure requires PG&E to install Automatic Shutdown Valves in three locations. PG&E has evaluated the use of remote control valves and automatic shut-off valves (RCV-ASV) as required by code section (§192.935(c)) for any high consequence areas, which states:

(c) Automatic shut-off valves (ASV) or Remote control valves (RCV). If an operator determines, based on a risk analysis, that an ASV or RCV would be an efficient means of adding protection to a high consequence area in the event of a gas release, an operator must install the ASV or RCV. In making that determination, an operator must, at least, consider the following factors—swiftness of leak detection and pipe shutdown capabilities, the type of gas being transported, operating pressure, threat of potential release, pipeline profile, the potential for ignition, and location of nearest response personnel.

After completing the review, PG&E agrees that installing such valves may be an efficient means of adding protection. However, PG&E strongly believes that using RCV's rather the ASV's is a better approach. Use of ASV's does not yield any additional protection beyond that realized by RCV's, and ASV's pose a concern of an unintended closure, which could lead to greater safety and reliability problems.

Lines 406 and 407 are part of a transmission pipeline network, which experiences a wide range of flow and pressure variations during normal operations. Since an ASV's are programmed to operate based upon flow and or pressure variations, the ASV could operate during normal conditions, causing an unplanned outage of customers in Yolo, Sacramento, El Dorado, Placer, Sutter, Yuba, and Nevada counties served by the proposed project. Large outages present the threat of customers relighting their own pilots, which could result in higher risks resulting from improper re-lights by customers

Additionally, activation of an ACV limits the response scenarios available to PG&E. With RCV's, PG&E personnel can lower the operating pressure of the pipeline to reduce the threat of damage while activating alternative supplies. PG&E can also provide temporary supplies downstream of the incident that could support customers, and then shut down the line after these supplies are in place. If the pipeline must be shut down, deferring this shutdown for a short period of time is sometimes prudent so that customers can be shut down in an orderly and safe manner.

Based upon the above, PG&E suggests the following changes.

PG&E plans to install remote operated valves at the Capay Station and the Yolo Junction Station, which would help to control the flow of gas into Lines 406 and 407. PG&E shall install automatic remote operated shutdown valves in three locations: Power Line Road MLV Station No. 752+00 (which includes the Riego Road Regulating Station), Baseline Road/Brewer Road MLV Station No. 1107+00, and Baseline Road Pressure Regulating Station No. 1361+00. These automatic remote operated shut

down valve locations would enhance public safety protection in the planned populated areas, which include schools and other existing and planned developments.

SECTION 4.8 HYDROLOGY AND WATER QUALITY

Unanticipated Release of Drilling Fluids

Page 4.8-18, line 17 (MM HWQ-1)

The DEIR requires PG&E to monitor turbidity downstream of the drill site. PG&E is required to obtain a permit from the Regional Water Quality Control Board, which will specify the required monitoring. Therefore, PG&E suggests the following modification to this mitigation measure:

Monitor water quality including turbidity in accordance with applicable Regional Water Quality Control Board permits. downstream of the drill site

Unanticipated Release of Drilling Fluids

Page 4.8-18, lines 25-26 (MM HWQ-1)

The DEIR requires PG&E to use non-toxic fluorescent dye in the drilling mud to allow easier identification of frac-outs.” However, drilling fluid is often used by farmers as an additive to their soils, and the addition of fluorescent dye will render the drilling fluid unusable to the farmers. Therefore, PG&E requests that this requirement be deleted.

Verify Well Locations

Page 4.8-20, lines 18-31 (MM HWQ-2)

The DEIR contains a mitigation measure to protect the supply of water in the vicinity of construction. PG&E suggests that this mitigation measure be modified as follows to enable PG&E to use a professional hydrogeologist to identify wells that need to be tested.

Prior to construction of the proposed Project, well locations within 200 feet of the excavation, construction staging areas, and aboveground facility locations shall be verified by PG&E through field surveys to determine if private water wells and water pipelines are currently in use and if their area of influence intersects the proposed Project site. This survey will be conducted by a licensed professional Hydrogeologist, who will determine any potential impacts from construction. Based on his professional opinion, wells will be tested as needed. With the landowner's permission, PG&E shall test the wells to determine the baseline flow conditions and monitor these wells during construction of the proposed Project. If, through monitoring, it is determined that Project construction is affecting well production, PG&E shall cease construction activities or arrange to supply water at the well location and consult with the landowner. Surveys shall be conducted by PG&E prior to construction to ensure that any unidentified springs are avoided during construction.

Flood-Proof Facilities

**Pages 4.8-21, line 23, to 4.8-22, line 2 (HWQ-3)
Page 4.8-34, lines 30-34; Page 4.1-13, lines 15-18**

The DEIR requires PG&E to place any pump stations and valve housing that are located within the 100-year flood zone at least 1 foot above the 100-year storm floor profile level. Because the stations have been designed to prevent an overpressure of the pipeline system in the event of a flood, PG&E requests that the requirement for elevating structures be

deleted. The text of the HWQ-3 should be modified, along with corresponding changes in chapter 4.1:

Pages 4.8-21, line 23, to 4.8-22, line 2

... Mitigation is proposed below to flood-proof any structures proposed to be constructed within a 100-year floodplain. Both proposed structures would be no more than 10 feet in height ~~without the flood-proofing. Flood-proofing would require the structures to be raised approximately 1 foot above the 100-year storm flood profile level.~~

Mitigation Measures for Impact HWQ-3: 100-Year Floodplain

MM HWQ-3 Flood-Proof Pump Houses Within 100-Year Floodplain. If any structures (pump stations, aboveground valve housing) associated with the buried pipeline are placed within the 100-year flood zone, the structure shall be "flood-proofed" in their foundation design ~~and raised in elevation to a minimum of 1 foot above the 100-year storm flood profile level,~~ to reduce the risk that they would be damaged during such an event.

Page 4.8-34, lines 30-34

... MM HWQ-3 would require the flood proofing of any structures associated with the above ground stations, ~~including but not limited to, the elevation of structures to 1 foot above the 100-year storm flood profile level.~~ Implementation of MM HWQ-3 in both the proposed project and Option H would reduce impacts to less than significant.

Page 4.1-13, lines 15-18

Regulating Station and the Powerline Road Main Line Valve structures would be constructed within the 100-year floodplain and would be no more than 10 feet in height ~~without the flood-proofing. The mitigation requires that the structures be raised approximately 1 foot above the 100-year storm flood profile level.~~

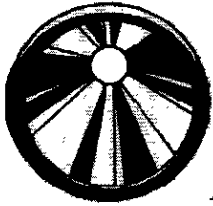
Thank you for the opportunity to comment on this DEIR. If you have any questions or would like to discuss these comments please contact me at your convenience.

Sincerely,



Chris Ellis, AICP
Principal Planner
Pacific Gas and Electric Company

Enclosure



Kiefner & Associates, Inc. _____

June 12, 2009

Mr. Scott Clapp
Gas Transmission Systems
130 Amber Grove Drive, Suite 134
Chico, California 95973

Re: Review of EIR for PG&E Lines 406 & 407

Dear Mr. Clapp:

In accordance with your request, I have reviewed certain documents that are part of the Draft Environmental Impact Report (EIR) for Pacific Gas & Electric (PG&E) Lines 406 and 407 proposed for construction between Esparta, Yolo County and Roseville, Placer County, CA. Lines 406 and 407 are to be constructed from 30-inch OD line pipe and will transport natural gas at a pressure of 975 psig. The pipeline route will cross primarily Location Class 1 (rural) areas, although it will also traverse Location Class 2 and Class 3 areas having greater amounts of development in the vicinity of the pipeline. The Location Classes are determined by the amount of land development in the vicinity of the pipeline as defined by Federal pipeline regulations contained in Code of Federal Regulations Title 49 – Transportation, Part 192 – Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards (49, CFR 192, or “Part 192”). The intrastate Lines 406 and 407 are under the jurisdiction of the California Public Utility Commission (CPUC) which has adopted 49 CFR 192 and enforces to its provisions. The pipelines will be designed, constructed, operated, and maintained accordingly.

The focus of my review was a risk assessment performed by EDM Services, Inc. Overall, I found that the results of the risk assessment were credible and not inconsistent with other risk assessments that have been performed by other parties concerning similar pipelines. However, I also discovered some data presented in EDM’s analysis that was inconsistent with other sources of data, and some statements or opinions that I did not fully agree with and which reasonable people might hold a difference of opinion over. Although these variances in raw data or interpretation imply that some numerical results might change, these would not necessarily alter the overall conclusions or invalidate the assessment.

The Table 1 below lists specific data presented, or statements made, in the Draft EIR dated April 13, 2009 and my comments in response. Additional tables summarize some data I used to evaluate EDM’s analysis.

Table 1. Comments on the Draft EIR Risk Assessment

Reference page or section	Comment
Section 2.1.2 bottom of page 2	Add closing statement: "Other portions of the regulations are prescriptive."
Section 4.1.1, page 11	<p>5,000 Btu/ft²-hr, 1% mortality corresponds to 30 seconds unabated exposure. An able-bodied person would take actions to increase the separation distance or seek cover during that 30 seconds.</p> <p>3,500 Btu/ft²-hr, 10-second exposure does not correspond to 15% probability of fatality. According to Hymes (1983) a 45-second exposure corresponds to 1% mortality.</p>
Section 4.1.2, page 13-14	Reference to 1970-1984 pipeline incident data is arguably not relevant because the data is 25-39 years old and standards and regulations for both new construction and the operation of existing lines have changed substantially. Changes are notable in the areas of fracture control for new pipe, routine use of ILI, adoption of damage prevention practices, and integrity management planning for high consequence areas, none of which were prevalent in 1970-1984.
Section 4.1.2, page 14-15	We get values that are close but not identical to those reported by EDM. For 1988-2008, we see 0.037 injuries and 0.0064 fatalities per 1,000 mi-yrs, compared with 0.040 and 0.010 reported on page 14 for 1986-2007. PHMSA's data web page for 1988 through 2008 tallies 382 "significant" incidents (same criteria as "reportable" incidents) for onshore gas transmission (323) and gathering (59) lines. This is much less than the 761 incidents stated on page 15 for 2002-2007. We get 0.18 incidents per 1,000 mi-yrs instead of the 0.42 incidents per 1,000 mi-yrs on page 16. However we get 0.019 injuries and 0.0033 fatalities, about the same as the 0.019 and 0.004 stated on page 15.
Figure 4.1.2-1, page 16	Using the tallies on PHMSA's data web page, the upper curve should vary between just above 0.10 and just below 0.30.
Page 17	We get 0.18 reportable incidents per 1,000 mi-yrs, not 0.29 for onshore gathering and transmission lines.
Pages 18-20	The US and CA hazardous liquid pipeline incident data may not be appropriate for evaluating the risk or threat associated with natural gas pipelines. Certainly pipelines in both categories are constructed from similar materials and to a layman would appear to present similar issues. However, they differ significantly in terms of operation, characteristics of transported products, failure modes, and consequences of a

	failure.
Page 21	Many of the factors in the bulleted items can be reasonably attributed to features associated with older pipelines and construction methods. Frequencies of these factors should be adjusted to reflect rates of occurrence appropriate to the features of modern pipeline design and construction.
Page 23	The first paragraph provides for a 30% reduction in damage by outside forces based upon the added depth in the pipeline design. Additional reductions should be included to address other relevant issues such as resistance to immediate penetration from equipment afforded by the heavy wall thickness and large pipe used with this project, as well as the overall record of new large-OD pipe in Class 3 areas. Refer to discussion for Page 57, below.
Page 27	PG&E will be installing remote monitoring of cathodic protection potentials at approximately 1-mile intervals along the route. This will provide real time data of the cathodic protection system and allow for a timely response to make corrections. The risk of incident due to corrosion should be significantly reduced.
Pages 29-30	It is unclear why LPG pipelines are discussed (page 30). PHMSA's incident data for LPG pipelines are not intermixed with data for natural gas lines, nor are LPG pipelines part of the proposed construction. Does Table 4.1.3-2 (page 29) include LPG lines, and if so, why?
Page 30	<p>The assertions that a release in an urban area is likely to cause more significant impacts to humans than a release in a rural area, and that the risk is understated for an urban area and overstated for a rural area both seem correct at first glance but appear to overlook some important factors.</p> <p>It is true that a worst-case scenario in an urban location would have greater consequences than a worst-case scenario in a rural location. But the probability of a worst-case scenario is greater in a rural location due to the higher operating stress levels and typically thinner wall pipe used in rural areas. It is noted for example that Class 3 lines comprise 11% of total gas pipeline mileage and 14% of gas pipeline reportable incidents, but there has only been one fatality caused by a Class 3 pipeline since 1989. Since 2002, there have been no fatalities in Class 3 or 4 and only one in Class 2. The heavier wall and lower operating stress does affect the susceptibility to failure and can affect its mode. Most major natural gas pipeline failures in the US have occurred in rural areas, e.g. Carlsbad. Also, Class 3 would automatically be designated a High Consequence Area (HCA)</p>

	and therefore would be subject to special integrity management planning rules that most portions of Class 1 and 2 lines would not be.
Baseline Frequency, page 31	We would use 0.18 incidents per 1,000 mi-yrs.
Indoor explosions, page 43	This does not reflect real modes of failure. Migration of gas to interiors of occupied buildings is primarily a concern with distribution piping systems which exist in close proximity and relatively low pressure. A leak at the operating pressure of 975 psig would blow a hole in the soil and vent the gas. Also, a leak would not tend to precede a rupture of the pipe.
Page 49, bottom of page	Statement that the “frequency of serious injuries or fatalities ...are extremely low due to the rural areas...” implies that the expected frequency would be greater in the more developed areas which is not supported by the data.
Page 52, first full paragraph	Statement that “should population or traffic volumes increase...the likelihood of serious injuries and fatalities would increase accordingly” does not account for changes in pipe wall, HCA designation, and IMP activity that offset increased risk by reducing likelihood of an incident. Note zero fatalities in Class 3 and 4 areas.
Page 55, HAZ-1a	A stated mitigation is for pipe to be manufactured in year 2000 or later. 49 CFR 192 currently requires pipe to comply with 43 rd (2004) or 44 th (2008) editions of API 5L. Pipe mills currently only monogram pipe to 44 th Edition, so pipe must be 2008 vintage or newer. From a practical standpoint, it will be brand new pipe.
Page 57, third-party damage	30-inch OD x 0.375-inch WT X65 pipe provides resistance to immediate penetration by equipment at the 98 th percentile in terms of size or weight (about 73 T). The 0.500-inch WT specified for Class 3 areas would resist an even larger machine (120 T) that is not used in general construction. It is noted that the one fatal incident in Class 3 pipe that occurred in 1997 had 0.281-inch WT which is resistant to machines only up to 45 T which are more common.

Some supporting data from PHMSA’s website data summary page or downloadable data is summarized below. Table 2 summarizes “reportable” or “significant” incident data from 2002-2008 for natural gas onshore gathering and transmission (G&T) lines. Incidents for lines of all ages and sizes are reported. The average rate of occurrence per 1,000 mi-yrs is given at the bottom of the table. Also listed is a tally of those that occurred in post-1980 large pipe (20-inch OD and larger) and small pipe (smaller than 20-inch OD). Because national mileage could not be easily broken down by both size and age (either size or age is readily done but not both), no average rates per mile-year are shown. However, it is noted that post-1980 pipe comprises 27%

of the total onshore G&T mileage, but the total number of incidents (50) and fatalities (1) in both post-1980 size ranges is only 13% and 14% of the total, respectively, indicating half the rate of occurrence for post-1980 pipe on a per mile-year basis. This reflects the improved technology associated with modern pipelines, relative to the aggregate US natural gas pipeline system which has a mileage-weighted average age of 40 years.

Table 2. Natural Gas Onshore G&T Pipeline Incidents, 2002-2008, All and Post-1980

Year	All G&T pipe incidents			Post 1980, D>=20"			Post 1980, D<20"		
	Total	Fatalities	Injuries	Total	Fatalities	Injuries	Total	Fatalities	Injuries
2002	40	1	5	3	0	0	4	0	0
2003	62	1	8	3	0	0	6	0	0
2004	44	0	3	2	0	0	6	0	0
2005	68	0	7	0	0	0	2	0	0
2006	62	3	5	4	1*	0	3	0	0
2007	55	2	7	6	0	0	6	0	0
2008	54	0	5	0	0	**	5	0	**
TOTAL =>	385	7	40	18	1	0	32	0	0
Avg/yr =>	55.000	1.000	5.714	2.571	0.143	0.000	4.571	0.000	0.000
Avg/1000 mi-yr	0.1833	0.0033	0.0190						

*1982 vintage pipe

**4 injuries reported for post-1980 pipe but pipe size not stated

Table 3 below compares the occurrences of incidents for all ages and sizes of natural gas G&T pipelines from 2002 through 2008 sorted by Location Class. The proportionate representations of total system mileage of Location Classes 1, 2, 3, and 4 are 77.4%, 10.9%, 11.4%, and 0.3%, respectively. These proportions of system mileage were used to estimate average rates per 1,000 mile-years, shown below. It is apparent that rates of reportable incidents varies widely by class, but rates of fatalities in Class 1 and 2 are similar to each other, and rates of fatalities in Class 3 and 4 are low (zero in the sample period). A longer sampling period also shows near-zero fatality rates for Class 3 lines (there are no Class 4 lines in the proposed project). This illustrates the effectiveness of the risk-informed design basis for pipelines by Location Class, as well as the focus of integrity management planning on high-consequence areas.

Table 3. Natural Gas Onshore G&T Pipeline Incidents, 2002-2008, by Location Class

Year	All Class 1			All Class 2			All Class 3			All Class 4		
	Total	Fatalities	Injuries	Total	Fatalities	Injuries	Total	Fatalities	Injuries	Total	Fatalities	Injuries
2002	31	1	2	2	0	0	7	0	1	0	0	0
2003	50	1	4	5	0	2	7	0	1	0	0	0
2004	32	0	2	5	0	0	7	0	1	1	0	0
2005	52	0	5	4	0	0	10	0	1	1	0	0
2006	47	3	3	5	0	1	8	0	1	0	0	0

2007	39	1	4	5	1	1	10	0	1	0	0	0
2008	40	0	5	1	0	0	2	0	0	1	0	0
TOTAL	291	6	25	27	1	4	51	0	6	3	0	0
Avg/yr	41.571	0.857	3.571	3.857	0.143	0.571	7.286	0.000	0.857	0.429	0.900	0.000
Avg/1000 mi-yr	0.1790	0.0037	0.0154	0.1198	0.0044	0.0178	0.2128	0.0000	0.0250	0.3106	0.0000	0.0000

This concludes my review of the draft EIR for PG&E Lines 406 and 407. If you have further comments or questions, please feel free to contact me.

Sincerely,



Michael J. Rosenfeld, PE
President

Crystal Spurr - PG&E Line 406 and 407 NOA of EIR 06-12-2009 .doc

From: "Angel Rinker" <ARinker@placer.ca.gov>
To: <spurrc@slc.ca.gov>
Date: 06/12/2009 2:47 PM
Subject: PG&E Line 406 and 407 NOA of EIR 06-12-2009 .doc

Please find attached the Placer County Air Pollution Control District's comments regarding the PG&E Line 406 & 407 project.



~~3091 County Center Drive, Suite 240 Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373~~

www.placer.ca.gov/apcd

Thomas J. Christofk, Air Pollution Control Officer

June 10, 2009

Crystal Spurr, Project Manager
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Sacramento, CA 95825
spurrc@slc.ca.gov

Subject: Pacific Gas and Electric Company (PG&E) Line 406-407 Natural Gas Pipeline /Notice of Availability of Draft Environmental Impact Report

Dear Mrs. Spurr:

Thank you for submitting the above referenced project to the Placer County Air Pollution Control District for review and comment. A portion of this project is located within the Sacramento Valley Air Basin (SVAB) portion of Placer County. The SVAB is classified as a severe non-attainment area for federal health based on ambient air quality standards for ozone. In addition, Placer County is also designated as a serious non-attainment area for State ozone ambient air quality standards and non-attainment for State particulate matter standards.

The PCAPCD and the Sacramento Metropolitan Air Quality Management District (SMAQMD) have developed significance thresholds that are used to determine the severity of a project's construction and long term operational impacts. These significance thresholds are used in all California Environmental Quality Act (CEQA) documents prepared by jurisdictions within Placer County and Sacramento County to evaluate project level air quality impacts. When a project spans Placer and Sacramento County lines, the air districts recommend that the lead agency use the more stringent of the two CEQA Significance Thresholds.

The proposed project has the potential to result in significant air quality impacts from construction equipment and activity. The California Environmental Quality Act (CEQA) Guidelines Section 15021

establishes a "duty for public agencies to avoid or minimize environmental damage where feasible." Therefore, an air analysis should be provided in environmental review process to quantify the project's short-term construction emissions and compared them to the air district's significant thresholds. If necessary, feasible mitigation measures should be identified and implemented by the project to prevent significant impacts. SMAQMD Road Construction 6.3.1 model is an acceptable planning tool recognized by the PCAPCD and SMAQMD to estimate roadway construction emissions.

Based on the air quality analysis prepared for this project, the project's related ozone precursor emissions in the year 2010 construction phase are expected to exceed the PCAPCD's significant thresholds and will result in a temporary increase in local and regional air quality impact. Mitigation measures should be implemented by the project to ensure the project's construction emission impacts will remain below the significant level.

In general, the District agrees with the analysis and conclusions provided in the Draft Environment Impact Report regarding the project's air quality impacts. The District would also like to recommend the following mitigation measures /conditions of approval be included within the scope of the proposed project.

1a. The applicant shall submit a Construction Emission / Dust Control Plan to the Placer County APCD. This plan must address the minimum Administrative Requirements found in section 300 and 400 of APCD Rule 228, Fugitive Dust. The applicant shall not break ground prior to receiving APCD approval of the Construction Emission / Dust Control Plan.

1b. The prime contractor shall submit to the District a comprehensive inventory (i.e. make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will be used an aggregate of 40 or more hours for the construction project. The inventory shall be updated, beginning 30 days after any initial work on site has begun, and shall be submitted on a monthly basis throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least three business days prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the District with the anticipated construction timeline including start date, and name and phone number of the property owner, project manager, and on-site foreman.

1c. The applicant shall provide a plan to the Placer County APCD for approval by the District demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

The contractor shall suspend all grading operations when fugitive dust exceeds Placer County APCD Rule 228 (Fugitive Dust) limitations. The prime contractor shall be responsible for having an individual who is CARB-certified to perform Visible Emissions Evaluations (VEE). This individual shall evaluate compliance with Rule 228 on a weekly basis. It is to be noted that fugitive dust is not to exceed 40% opacity and not go beyond property boundary at any time. If lime or other drying agents are utilized to dry out wet grading areas they shall be controlled as to not to exceed Placer County APCD Rule 228 Fugitive Dust limitations.

An enforcement plan shall be established, and submitted to the APCD for review, in order to weekly evaluate project-related on-and-off- road heavy-duty vehicle engine emission opacities, using standards as defined in California Code of Regulations, Title 13, Sections 2180 - 2194. An Environmental Coordinator, hired by the prime contractor or property owner, and who is CARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely evaluate project related off-road and heavy duty on-road equipment emissions for compliance with this requirement. Operators of vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be

d within 72 hours.

The prime contractor shall suspend all grading operations when wind speeds (including instantaneous gusts) exceed 25 miles per hour and dust is impacting adjacent properties.

The contractor shall use CARB ultra low diesel fuel for all diesel-powered equipment. In addition, low sulfur fuel shall be utilized for all stationary equipment.

Pursuant to the Placer County Air Pollution Control District Rule 501, General Permit Requirements, the proposed project may need a permit from the District prior to construction. In general, any engine greater than 50 brake horsepower or any boiler with heat greater than 1,000,000 Btu per hour will need a permit issued by the District.

Thank you for the opportunity to review this proposal. If you have any question or comments please phone 530-745-2333.

Sincerely,

Angel Rinker

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