

1 3.0 RESPONSES TO COMMENTS

2 Copies of the written comments that were submitted on the Draft EIR are provided in
3 this section, as well as excerpts of the transcripts from the public hearings held on
4 June 3, 2009 and June 4, 2009 (the complete transcripts are in Appendix J). Each
5 numbered Comment Set is immediately followed by the corresponding responses.
6 Comment letters are presented chronologically, in the order dated or that the
7 California State Lands Commission (CSLC) received the comment, followed by the
8 comments received during the public hearings. The comments received by the
9 CSLC during the public review period on the Draft EIR and at the public hearings
10 were reproduced in a Final EIR that was circulated to the public on July 27, 2009.
11 The same comments received by CSLC during the public review period on the Draft
12 EIR and at the public hearings are reproduced in this Revised Final EIR along with
13 responses to comments. The Revised Final EIR shows changes made to the
14 response to comments since release of the Final EIR on July 27, 2009, as underline
15 for new text, and ~~strike-out~~ for deleted text. In addition, the Revised System Safety
16 and Risk of Upset report is included in this Revised Final EIR as Appendix H-3.

17 The Revised Final EIR is being circulated for public review in order to provide
18 agencies and the public details regarding the clarifications made to the risk analysis.
19 Clarifications have been made to the System Safety and Risk of Upset Report
20 prepared by EDM Services, Inc. that was included as Appendix H-3 to the Draft EIR.
21 The Revised System Safety and Risk of Upset report shows changes as underline
22 for new text, and ~~strike-out~~ for deleted text, and is included as Appendix H-3 to this
23 Revised Final EIR. Revisions to the Draft EIR, Section 4.7, Hazards and Hazardous
24 Materials, and Section 4.9, Land Use and Planning, regarding the risk analysis are
25 provided in Section 4.0 of this Revised Final EIR.

26 The earlier version of the risk assessment included risk measurement terminology
27 that was not defined in the document, which has resulted in some confusion. The
28 “aggregate risk” was presented in the Draft EIR erroneously as “individual risk”. The
29 aggregate risk presents the anticipated annual likelihood of fatalities from all of the
30 project components, which includes approximately 40 miles of 30-inch diameter
31 pipeline, 2.5 miles of 10-inch diameter pipeline, and six fenced, aboveground
32 pressure limiting, pressure regulating, metering, and mail line valve stations. The
33 actual “individual risk”, relates to the risk to an individual at a specific location.
34 Individual risk is most commonly defined as the frequency that an individual may be
35 expected to sustain a given level of harm from the realization of specific hazards, at
36 a specific location, within a specified time interval. The risk level is typically

1 determined for the maximally exposed individual (assumes that a person is present
 2 continuously—24 hours per day, 365 days per year). The individual risks are
 3 evaluated using two approaches: a simplified and enhanced approach.

4 Section 4.1.4 of the Draft EIR correctly stated that a commonly accepted “individual
 5 risk” threshold is an annual likelihood of fatality of one in one-million (1:1,000,000)
 6 for fatality (used by the California Department of Education for school sites).
 7 However, the report incorrectly compared the calculated “aggregate risk” to the
 8 threshold for “individual risk”. “Aggregate risk” has no known established threshold
 9 and is not used in practice to determine individual risk.

10 The highest individual risk along a segment of pipeline is to persons located
 11 immediately above the pipeline. As the distance from each pipeline segment
 12 increases, the individual risk decreases. The maximum risk posed by Line 406
 13 before mitigation is 1:2,137,000, and after mitigation it is 1:4,274,000 chance of
 14 fatality per year. The maximum risk posed by Line 407 before mitigation is
 15 1:2,062,000, and after mitigation it is 1:4,115,000 chance of fatality per year. The
 16 maximum risk posed by Line DFM before mitigation is 1:4,255,000, and after
 17 mitigation it is 1:8,475,000. Since the maximum calculated individual risk is less
 18 than the threshold, the risk is considered to be less than significant.

19 Individual comments received during the Draft EIR public review comment period
 20 are numbered in the margins of each comment letter and correspondingly numbered
 21 responses follow each letter. Table 3-1 and Table 3-2 list all comments and show
 22 the comment set identification number for each letter or comment from the public
 23 transcripts.

24 Errata and minor text clarifications within the Draft EIR arising from the comments
 25 and responses are presented in Section 4.0 of this Revised Final EIR.

26 **Table 3-1: Commenters and Written Comment Set Number**

Draft EIR Comment Set #	Agency / Affiliation	Name of Commenter	Date of Documentation or CSLC Receipt
A	United Auburn Indian Community of the Auburn Rancheria	Greg Baker, Tribal Administrator	May 27, 2009
B	Property Owners	Howard and Bonnie Lopez	May 29, 2009
C	Property Owners	William Dibble, Barbara Dibble, Dorothy Dibble	June 1, 2009

Draft EIR Comment Set #	Agency / Affiliation	Name of Commenter	Date of Documentation or CSLC Receipt
D	Enterprise Rancheria	Ren Reynolds	June 4, 2009
E	Property Owner	Isabel Story	June 4, 2009
F	Property Owner	Alisa Stephens	June 8, 2009
G	Center Joint Unified School District	Craig Deason	June 9, 2009
H	Yolo County Board of Supervisors	Mike McGowan	June 10, 2009
I	Microp Limited	TR Martin	June 10, 2009
J	Department of Transportation –District 3	Alyssa Begley	June 11, 2009
K	City of Roseville	Mark Morse	June 12, 2009
L	Placer County Air Pollution Control District	Angel Rinker	June 12, 2009
M	Sacramento Metropolitan Air Quality Management District	Paul Philley	June 12, 2009
N	Feather River Air Quality Management District	Sondra Anderson	June 12, 2009
O	Yolo-Solano Air Quality Management District	Matt Jones	June 12, 2009
P	Hefner, Stark & Marois, LLP	Martin B. Steiner	June 12, 2009
Q	Klein Family Farms	Chris Ochoa and Mark Ochoa	June 12, 2009
R	Sierra Vista Owners Group	Jeff Jones	June 12, 2009
S	Pacific Gas and Electric Company	Chris Ellis	June 12, 2009
T	Placer County Community Development	Maywan Krach	June 15, 2009
U	Remy, Thomas, Moose and Manley, LLP	Sabrina V. Teller	June 12, 2009
V	Central Valley Flood Protection Board	James Herota	June 12, 2009
W	California Regional Water Quality Control Board, Central Valley Region	Virginia Moran	June 12, 2009
X	California Department of Fish and Game	Kent Smith	June 18, 2009

Draft EIR Comment Set #	Agency / Affiliation	Name of Commenter	Date of Documentation or CSLC Receipt
Y	Yolo County Farm Bureau	Tim Miramontes	June 23, 2009

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Table 3-2: Public Hearing Draft EIR Comments - June 3 and 4, 2009

Comment Agency/Affiliation	Name of Commenter	Comment #	Copy of Transcript of Hearing
Wednesday, June 3, 2009, 3:00 p.m. Public Hearing Draft EIR Comments, Roseville, CA			
Local Resident	Bill Dibble	PT-1 to PT-10	Pages 25 through 31
Local Resident	Alisa Stephens	PT-11 to PT-21	Pages 32 through 39
Representative of DF Properties Land Owner	Nick Alexander	PT-22 to PT-25	Pages 39 through 41
Local Resident	Norepaul Mouaryang	PT-26 to PT-29	Pages 41 through 44
Local Resident	Mai Neng Yang	PT-30 to PT-31	Pages 44 through 47
Wednesday, June 3, 2009, 5:30 p.m. Public Hearing Draft EIR Comments, Roseville, CA			
No oral comments	No oral comments	No comments	Page 1
Thursday, June 4, 2009, 3:00 p.m. Public Hearing Draft EIR Comments, Woodland, CA			
Local Resident	Howard Lopez	PT-32 to PT-43, PT-64 to PT-66	Pages 22 through 29, 42 through 45
Local Resident	James Bennett	PT-44 to PT-46	Pages 30 through 31
Local Resident	Wilma Stephens Hill	PT-47 to PT-49	Pages 31 through 33
Local Resident	Chris Ocha	PT-50 to PT-53, PT-68	Pages 33 through 35, 49
Local Resident	Ed Mast	PT-54 to PT-55	Pages 35 through 36
Local Resident	Fulton Stephens	PT-56 to PT-57	Pages 36 through 37
Local Resident	Paul Smith	PT-58 to PT-63, PT-69	Pages 37 through 41, 50
PG&E	Barbara Butterfield	PT-67	Page 47
Thursday, June 4, 2009, 5:30 p.m. Public Hearing Draft EIR Comments, Woodland, CA			
Local Resident	Barbara Dibble	PT-70 to PT-77	Page 17 through 21

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

A-1

1 **RESPONSE TO COMMENT SET A**

2 **A-1** All work in the Project alignment will adhere to the measures outlined in
3 Applicant Proposed Mitigation (APM) CR-3, APM CR-4, and APM CR-5, which are
4 included in the Draft EIR in Table ES-1 of the Executive Summary; Section 4.5.4 of
5 the Draft EIR. These APMs address inadvertent discoveries of buried materials and
6 require notification of the local Native American community prior to subsurface
7 excavations at prehistoric archaeological sites.

8

9

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. | B-1
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. | B-2
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. | B-3

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. B-3
8. Activities with heavy equipment such as leveling, deep ripping and simply crossing this line will be restricted. B-4
9. The landowner will get zero benefit from the pipeline. B-5
10. They will have the right to come on our property whenever they see fit. B-5
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. B-6
12. The pipeline will be crossing a known earthquake fault line in the vicinity of freeway 505. B-7
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 B-8

Any question call us at 787-3384.



Howard and Bonnie Lopez

1 RESPONSE TO COMMENT SET B

2 **B-1** The statement and concerns regarding economic impact to farmland is
3 included in the public record and will be taken into account by decision-makers when
4 they consider certification of the EIR and consider whether to approve the proposed
5 Project. PG&E has their own process, separate from the Environmental Impact
6 Report prepared pursuant to the CEQA, which addresses negotiations with
7 landowners. In developing projects, PG&E identifies routes based on engineering
8 and environmental considerations. In performing the field work prior to submitting an
9 application for a proposed project to the CSLC, PG&E often engages in discussions
10 with landowners and may be able to address their concerns. PG&E prefers to work
11 out property rights with landowners in a mutually agreeable manner. PG&E will work
12 with landowners and their tenant farmers to arrive at agreed upon compensation
13 both for the value of the pipeline easement, as well as the impacts to agricultural
14 crops resulting from this pipeline Project. The CSLC is not involved in the PG&E
15 discussions and negotiations with landowners.

16 PG&E provided an application to the CSLC for a lease of CSLC lands, thereby
17 triggering the need for environmental review of their proposed pipeline Project. The
18 CSLC is the lead agency for the preparation of an EIR in accordance with CEQA.
19 The CEQA process is a public disclosure and participation process regarding the
20 environmental effects of a proposed project.

21 The proposed 40-mile pipeline Project would temporarily disturb 511 acres of
22 farmland within four counties (329 acres in Yolo County, 91 acres in Sutter County,
23 18 acres in Sacramento County, and 73 acres in Placer County). Based on
24 response to comment S-15, pages 4.2-24 and 4.2-25 of the Draft EIR have been
25 revised to reflect that the proposed Project would prohibit the planting of deep-rooted
26 plants, such as trees or vines within 10 feet (rather than the previously stated 15
27 feet) on either side of the pipeline centerline (20 feet, rather than 30 feet total within
28 the permanent easement). This would result in the limitation of crops grown on 102
29 acres of farmland within the four counties to row crops, field crops, or any other
30 crops that do not involve deep-rooted plants. The proposed Project would result in
31 the loss of 2.0 acres of orchards located within Yolo County. The proposed Project
32 would permanently impact 2.55 acres of farmland across all four counties due to the
33 aboveground stations. Temporary and permanent agricultural impacts are
34 discussed on pages 4.2-23 through 4.2-25 of the Draft EIR, and revisions to the
35 Draft EIR can be reviewed in Section 4.0 of this Revised Final EIR.

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

- 5 • Section 1245.030(b) requires compensation for property damage, including
6 crop damage, resulting from pre-construction project studies, testing,
7 surveying, etc.
- 8 • Section 1263.210(a) requires all property improvements, including agricultural
9 crops and associated facilities and infrastructure, be included in project land
10 rights acquisition compensation.
- 11 • Section 1263.250(a) requires compensation for crop damage/losses resulting
12 from project construction. It also requires scheduling project construction to
13 avoid impacts to agricultural crops when possible.

14 According to CEQA Guidelines Section 15358(b), effects analyzed under CEQA
15 must be related to a physical change in the environment. CEQA Guidelines Section
16 15125 (a) provides that an EIR must include a description of the physical
17 environmental conditions in the vicinity of the project as they exist at the time of the
18 Notice of Preparation of the EIR, or at the time environmental analysis is
19 commenced (baseline conditions). The introduction of the Draft EIR, Section 1.0,
20 provides a definition of the affected environment, and each major resource section of
21 the Draft EIR provides an environmental setting, including agricultural resources.
22 Attempting to determine future uses of farmland currently planted in field or row
23 crops that would be converted to orchard or vineyard is too speculative for
24 evaluation.

25 We analyzed the impact to agricultural resources based on baseline conditions
26 being able to continue once the pipeline was installed and the topsoil restored. Most
27 of the agricultural land along the proposed Project alignment is used for row or field
28 crops. Refer to pages 4.2-23 through 4.2-25 of the Draft EIR for a discussion of
29 temporary and permanent impacts to agricultural land. The temporary impacts to
30 the 511 acres of farmland would not result in a physical change to the environment
31 for more than three weeks in any one area, or in the case of horizontal directional
32 drilling (HDD), for more than four weeks. In addition, the amount of farmland
33 permanently impacted (2.55 acres) across all four counties, and the amount of
34 farmland converted from

1 deep-rooted plants to other types of crops (2.0 acres of orchard loss) located within
2 Yolo County does not represent a significant regional loss.

3 **B-2** Please refer to response to comment B-1.

4 **B-3** Please refer to response to comment B-1. Public Utility Easements
5 (PUEs) may exist in which PG&E and other utilities have installed facilities.
6 However, in general PUEs do not provide sufficient rights and protection for large
7 transmission facilities. Therefore, PG&E acquires easements to install transmission
8 facilities rather than PUEs.

9 Segmenting property with a utility easement for a buried pipeline does not preclude
10 the use of the easement for farming, once construction of the pipeline is complete,
11 but only precludes the planting of deep-rooted crops. As discussed on page ES-32,
12 while Alternative Options A, B, C, D, E, and G would result in similar impacts to
13 agricultural resources as the proposed Project, these options would reduce the
14 number of agricultural fields that would be segmented by the Project. However,
15 implementation of these alternative options would result in increased impacts
16 associated with factors such as movement of the pipeline closer to roadways,
17 residences, and in some cases businesses, thereby increasing the number of people
18 that would be at risk if a rupture of the pipeline were to occur with a subsequent
19 explosion and/or fire. Please also refer to responses to comments B-1 and E-3.

20 **B-4** As noted on page 4.2-24 of the Draft EIR, most farming practices would
21 be allowed to resume within the permanent easement following pipeline completion.
22 The pipeline is proposed to be constructed with 5 feet of soil coverage in order to
23 allow farming activities such as discing or deep-ripping to continue within the entire
24 easement. PG&E has increased the soil coverage beyond minimum requirements
25 from 3 feet to 5 feet because PG&E's experience has demonstrated that this depth
26 is sufficient to eliminate most threats from agricultural operations. Restrictions to
27 crossing the easement would exist during project trenching, installation, and backfill.
28 As described on page 2-54 of the Draft EIR, such restrictions would be expected to
29 last no more than three weeks.

30 **B-5** Please refer to response to comment B-1 for a discussion regarding
31 landowner compensation.

32 Regarding pipeline access, the Draft EIR on page 2-38 of Section 2.0, Project
33 Description, states, "Routine maintenance along the majority of the line would
34 consist of quarterly to annual patrolling (e.g., foot or aerial patrol), cathodic

1 protection, and surveys. PG&E would maintain a 50-foot-wide permanent easement
2 along the length of the Project, with the exception of the Powerline Road DFM,
3 which would have a 35-foot-wide permanent easement. Vegetation maintenance
4 would be as needed to maintain a 30-foot-wide corridor centered on the pipe that is
5 free of deep-rooted plants. Because the majority of the route is grassland, row
6 crops, or rice fields, very few areas are expected to require vegetation maintenance
7 by PG&E.” (Please note that in response to comment S-15, the 30-foot-wide
8 corridor that is free of deep-rooted plants has been decreased to a 20-foot-wide
9 corridor. Please refer to Section 4.0 of this Revised Final EIR for changes to the
10 Draft EIR.)

11 PG&E has provided information that some annual patrols are conducted from the air
12 so no access to the property is required. When a patrol or inspection on the ground
13 is required, vehicles will use existing farm roads and off-road travel will be on foot.
14 PG&E tries to schedule these ground inspection activities at such times that they do
15 not impact agricultural activities. In the unlikely event of ground disturbing
16 maintenance activities, PG&E will work with the landowner to minimize disruption to
17 their property and activities.

18 **B-6** The Revised Final EIR provides an analysis that has been clarified to
19 account for individual risks to the public due to the potential for fires and explosions,
20 which may result from pipeline releases. A revised System Safety and Risk of Upset
21 report was completed by EDM Services, Inc. for the proposed Project, and is
22 included as Appendix H-3 of this Revised Final EIR. Revisions to the Draft EIR,
23 Section 4.7, Hazards and Hazardous Materials, and Section 4.9, Land Use and
24 Planning, regarding the risk analysis are provided in Section 4.0 of this Revised
25 Final EIR. The risk analysis was revised because the aggregate risk was calculated
26 and reported as individual risk. In addition, the risk analysis incorrectly compared
27 the aggregate risk to the individual risk threshold of an annual likelihood of fatality of
28 1:1,000,000. The individual risk is defined as the frequency that an individual may be
29 expected to sustain a given level of harm from the realization of specific hazards, at
30 a specific location, within a specified time interval (measured as the probability of a
31 fatality per year). Aggregate risk is the total anticipated frequency of fatalities that
32 one might anticipate over a given time period for all of the project components (the
33 entire pipeline system). There is no known established threshold for aggregate risk.

34 ~~In addition, Table 5.1.5-1 of the report, as well as Table 4.7-6 on pages 4.7-34 and~~
35 ~~4.7-35 of the Draft EIR, summarizes the potential consequences from fires and~~
36 ~~explosions at various distances from the proposed pipeline.~~

1 Generally, natural gas could be released from a leak or rupture in the pipeline. If the
2 natural gas reached a combustible mixture and an ignition source was present, a fire
3 and/or explosion could occur.

4 The individual risk significance threshold used in the Revised Final EIR is an annual
5 likelihood of one in one-million (1:1,000,000) for serious injury or fatality (used by the
6 California Department of Education for school sites). The risk level is typically
7 determined for the maximally exposed individual (assumes that a person is present
8 continuously—24 hours per day, 365 days per year).

9 The maximum risk posed by Line 406 in Yolo County before mitigation is
10 1:2,137,000, and after mitigation is 1:4,274,000 chances of fatality per year. The
11 highest risk along a segment of pipeline is to persons located immediately above the
12 pipeline, and the risk decreases as a person is farther away from the pipeline.
13 Because the calculated individual risk is less than the threshold of 1:1,000,000, the
14 risk is considered to be less than significant.

15 ~~The level of risk posed by Line 406 in Yolo County before mitigation is 1:350,000,~~
16 ~~which is 3 times greater than the level of risk generally considered acceptable. After~~
17 ~~mitigation, the level of risk posed by Line 406 would be approximately 1:700,000,~~
18 ~~which is still greater than the level of risk generally considered acceptable. The~~
19 ~~overall total annual likelihood of serious injury or fatality, taking into account the~~
20 ~~entire pipeline route, is 1:16,000 before mitigation. The mitigation measures being~~
21 ~~imposed on the Project would reduce the risk by approximately 50 percent.~~
22 ~~However, the individual risk of serious injury or fatality would still be approximately~~
23 ~~1:30,000, 33 times greater than the level of risk generally considered acceptable.~~
24 ~~(Please refer to page 4.7-33 and 4.7-39 of the Draft EIR.)~~

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

32 **B-7** In addition to all other applicable federal and State codes, regulations, and
33 industry standards for pipeline design, the CSLC requires that the pipeline design
34 also meet the requirements of current seismological engineering standards such as

1 the “Guidelines for the Design of Buried Steel Pipe” by American Lifeline Alliance
2 and “The Guidelines for the Seismic Design and Assessment of Natural Gas and
3 Liquid Hydrocarbon Pipelines” by the Pipeline Research Council International, Inc.
4 The CSLC also required that all engineered structures, including pipeline alignment
5 drawings, profile drawings, buildings, structures, and other appurtenances and
6 associated facilities, be designed, signed, and stamped by California Registered
7 professionals certified to perform such activities in their jurisdiction.

8 The faults within the Project area are discussed in the Draft EIR, Section 4.6,
9 Geology and Soils (reference pages 4.6-19 through 4.6-31).

10 The geotechnical report prepared for the proposed Project notes that “evidence
11 suggests that, although the Dunnigan Hills fault shows compelling evidence of
12 surface rupture a few miles north of the proposed alignment, the fault becomes
13 buried in the area where the proposed alignment crosses it.” The Draft EIR provides
14 an impact and mitigation measure regarding earthquake faults and seismic risks to
15 the pipeline. A portion of Impact GEO-1 on page 4.6-39 of the Draft EIR has been
16 revised. Mitigation Measure (MM) GEO-1 on page 4.6-39 and 4.6-40 of the Draft
17 EIR has also been revised. Refer to Section 4.0 of this Revised Final EIR for
18 revisions to the Draft EIR.

19 **B-8** Section 3.0 of the Draft EIR evaluates a number of alternatives or options
20 along the proposed pipeline alignment to reduce or avoid one or more impacts of the
21 proposed Project. This comment expresses a preference for the No Project
22 Alternative (1st choice) or Option E (2nd choice). The No Project Alternative means
23 that PG&E would not construct/operate the natural gas pipeline along the proposed
24 route. Option E would involve a minor realignment of the proposed Line 406 route to
25 follow CR-19, east of CR-87. At CR-19A, it would extend back to the north via an
26 existing dirt road and underneath a large electrical transmission corridor. The
27 pipeline would then cross an irrigation lateral and continue north where it would
28 converge back with the proposed Line 406 route, just west of I-505. The pipeline
29 would then follow the same route as the proposed Project east of I-505. This
30 alternative would increase slightly the total length of the pipeline. Figure 3-2D of the
31 Draft EIR shows Option E.

32 The reason Option E was considered is that it would meet all of the basic Project
33 objectives and would reduce segmenting agricultural fields in the Hungry Hollow
34 area. However, this alternative would require locating the pipeline closer to several

1 residences and result in the removal of trees from an existing orchard situated along
2 CR-19.

3 The CSLC will make two decisions regarding the PG&E Line 406-407 Natural Gas
4 Pipeline Project at one of the CSLC's public meetings. The first decision will be
5 whether to certify the EIR that was prepared for the proposed PG&E Line 406-407
6 Natural Gas Pipeline project. The second decision to be made by the CSLC will be
7 whether to approve the environmentally superior alternative ~~proposed project~~, which
8 is the construction of the PG&E Line 406-407 Natural Gas Pipeline, inclusive of all
9 project components and Options I and L. The CSLC could also choose at that time
10 to approve any of the other options and any alternatives that were analyzed in the
11 EIR. A notice of the date, time, and location of the public meeting where the Project
12 will be considered by the Commissioners will be mailed to everyone on the CLSC
13 mailing list and to everyone who has commented on the Draft EIR, at a minimum of
14 10 to 15 days prior to the date of the meeting.

From: <dibblesbs@inreach.com>
To: "Crystal Spurr" <spurrc@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.

C-1

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.

C-2

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.

C-3

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.

C-4

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".

C-5

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.

C-6

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

1 **RESPONSE TO COMMENT SET C**

2 **C-1** Please refer to response to comment B-1.

3 **C-2** Please refer to response to comment B-1.

4 **C-3** Please refer to response to comment B-1.

5 **C-4** Please refer to response to comment B-6. Please see the Revised
6 System Safety and Risk of Upset report in Appendix H-3 of this Revised Final EIR.
7 Also, please see Section 4.7 of the Draft EIR, as revised in the Revised Final EIR,
8 and the EDM Services, Inc. report included in Appendix H for a discussion of the
9 number of pipeline incidents on 30- to 36-inch natural gas pipelines. Both include
10 credible references regarding pipeline incident statistics.

11 **C-5** The commenter is referring to the use of CR-16 as a pipeline alignment.
12 While portions of Option A and Option B follow CR-16 (refer to pages 3-12 and 3-13
13 of the Draft EIR), it is the portion of the Line 406 Central Alternative that would cross
14 hillsides between Hwy 505 and I-5 for which sloughing was a primary concern. The
15 Line 406 Central Alternative was considered but eliminated from full evaluation in the
16 Draft EIR (refer to pages 3-10 and 3-11 of the Draft EIR) because this proposed
17 pipeline alignment alternative would be longer than the preferred alternative
18 (resulting in greater impacts) and would require crossing a greater amount of
19 potential foraging habitat for Swainson's hawk, nesting habitat for burrowing owls,
20 and other habitats utilized by special-status species. This alternative would also
21 require construction along sidehills, which would present additional engineering,
22 construction, and maintenance considerations.

23 **C-6** Please refer to responses to comments B1 and C-4.

24



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 !**

D-1

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.

D-2

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

D-3

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!

D-4

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.

1 RESPONSE TO COMMENT SET D

2 **D-1** Please refer to Figures 2-4, 2-5, and 2-6, which provide detailed views of
3 the proposed pipeline location within Sutter County. Portions of Sutter County
4 affected by the Project are shown on various figures throughout the Draft EIR,
5 including Figure 2-1, 2-2, 2-4, 2-5, 2-6, 2-7, 2-12, and 2-15; Figure 3-2A, 3-2 Map 2
6 of 3, 3-2G Map 3 of 3, and 3-3; Figure 4.2-1B and 4.2-1C; Figure 4.3-1; Figure 4.4-1,
7 4.4-2, and 4.4-3; Figure 4.6-1, 4.6-2B, 4.6-2C, 4.6-3, and 4.6-4; Figure 4.8-1; Figure
8 4.9-1B and 4.9-1C; Figure 4.13-1; and Figure 5-1.

9 **D-2** Please refer to APM CR-3, APM CR-4, and APM CR-5, which are
10 included in Section 4.5.4 of the Draft EIR. These APMs address the inadvertent
11 discovery of archaeological resources. As described on page 4.5-36 of the Draft
12 EIR, these APMs require PG&E to consult with the local Native American community
13 prior to any subsurface excavation at prehistoric archeological sites to give them the
14 opportunity to monitor the excavations; allow supervision of trenching by a qualified
15 professional archaeologist and/or geo-archeologist; stop work near discovered
16 potential resources; and develop a Discovery Plan indicating the appropriate
17 treatment of archeological materials or human remains.

18 **D-3** Comment acknowledged. As outlined in APM CR-4, on page 4.5-36 of the
19 Draft EIR, the discovery of human remains outside a dedicated cemetery will require
20 compliance with Health and Safety Code Section 7050.5.

21 **D-4** As discussed above in response to comment D-2, and as outlined in APM
22 CR-3, APM CR-4, and APM CR-5, the PG&E would work with the local Native
23 American community during Project implementation. These APMs are included in
24 the revised Mitigation Monitoring Program in ~~Appendix F~~ of this Revised Final EIR.

25

RECEIVED
CALIFORNIA STATE
LANDS COMMISSION
OCT 23 PM 1:32

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe 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.

E-1

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.

E-2

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

E-3

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?

E-3
Cont.

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.

E-4

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.

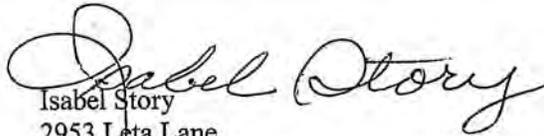
E-5

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.

E-6

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

Sincerely,



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

1 RESPONSE TO COMMENT SET E

2 **E-1** CSLC acknowledges that the Dunnigan Hills area is referred to as an
3 appellation of origin by at least five vintners. Text has been added to page 4.2-2,
4 line 11 of the Draft EIR describing the Dunnigan Hills appellation area. Refer to
5 Section 4.0 of the Revised Final EIR for revisions to the Draft EIR.

6 **E-2** Pages 4.8-11 through 4.8-13 of the Draft EIR discuss construction-related
7 impacts to groundwater flow and supply (see Section 4.8.5, Hydrology and Water
8 Quality). As proposed in APM HWQ-3 and APM HWQ-4, and APM BIO-20 and
9 APM BIO-21, the Project incorporates design features and construction techniques
10 that reduce potential impacts to groundwater flow to less than significant levels.
11 Trenching or directional drilling in accordance with these APMs would ensure that
12 the Project would not substantially deplete groundwater supplies or interfere
13 substantially with groundwater recharge such that there would be a net deficit in
14 aquifer volume or a lowering of the local groundwater table level. As discussed on
15 page 4.4-80 in Section 4.4, Biological Resources, implementation of APM BIO-5,
16 APM BIO-7, APM BIO-13, APM BIO-16, and APM BIO-23 would further reduce
17 potential impacts to groundwater flow to less than significant levels. Please also
18 refer to response to comment F-5.

19 **E-3** Yolo County General Plan goals regarding agriculture that are applicable
20 to the proposed Project are included on page 4.2-19 of the Draft EIR. Page 1-8 of
21 the Draft EIR has been revised to indicate that PG&E, as a CPUC-regulated entity,
22 is not required to adhere to county or city zoning or land use designations, nor are
23 they required to obtain discretionary permits from such jurisdictions. However,
24 PG&E may be required to obtain ministerial permits, such as grading and
25 encroachment permits, from affected counties, cities or other local jurisdictions, such
26 as reclamation districts. Furthermore, PG&E may be required to obtain permits or
27 approvals from certain reviewing authorities such as those listed in Section 1.0,
28 Introduction, under the heading 1.4 Permits, Approvals, and Regulatory
29 Requirements, beginning on page 1-8 of the Draft EIR. Refer to section 4.0 of this
30 Revised Final EIR for revisions to the Draft EIR.

31 While PG&E, as a CPUC-regulated entity, is not required to adhere to local
32 jurisdiction regulations, Yolo County's General Plan policies were taken into
33 consideration during the preparation of the Draft EIR. As noted on page 4.2-24 of
34 the Draft EIR (as amended in Section 4.0 of the Revised Final EIR), restrictions on
35 deep-rooted plants and vines would affect approximately 102 acres of farmland in

1 Yolo County. The majority of the land within the proposed permanent easement is
2 grassland, row crops, or rice fields, and these activities could continue within the
3 permanent easement. Attempting to determine that future uses of farmland currently
4 planted in field or row crops would be converted to orchard or vineyard is too
5 speculative for evaluation. The temporary impacts to the 511 acres of farmland
6 would not result in a physical change to the environment for more than three weeks
7 in any one area, or in the case of HDD, for more than four weeks. In addition, the
8 amount of farmland permanently removed (2.55 acres) across all four counties, and
9 the amount of farmland converted from deep-rooted plants to other types of crops
10 (2.0 acres of orchard loss) located within Yolo County does not represent a
11 significant regional loss. In addition, it is not an uncommon practice to plant
12 commercial cover crops in vineyards and orchards between the rows, such as fava
13 beans. Such shallow-rooted crops would be allowed within the 10 feet on either side
14 of the pipeline.

15 PG&E would coordinate with landowners, tenant farmers, and adjacent property
16 owners prior to and during construction of the proposed pipeline in order to
17 coordinate the construction schedule with agricultural activities such as crop
18 spraying, crop irrigation, and harvest activities. For construction activities within rice
19 fields, the proposed plan is that PG&E work with landowners to isolate the right-of-
20 way prior to the fall, so that construction can begin on May 1 (or as soon as the field
21 is sufficiently dry) without interfering with the rice field preparation, planting, and
22 flooding schedule (refer to the Draft EIR, page 2-51).

23 The proposed Project would prohibit the planting of deep-rooted plants, such as
24 trees or vines within 10 feet on either side of the pipeline centerline (20 feet total
25 within the permanent easement). This would result in the limitation of crops grown
26 on approximately 102 acres of farmland within the four counties to row crops, field
27 crops, or any other crops that do not involve deep-rooted plants. Most of the
28 agricultural land along the proposed Project alignment is currently used for row or
29 field crops, and those types of uses would be allowed to continue within the entire
30 pipeline permanent easement once the pipeline has been installed and the topsoil
31 restored.

32 While Attachment A to Comment Letter E is a letter sent in response to the Kinder
33 Morgan Concord to West Sacramento Pipeline Project, not the Line 406/407 Natural
34 Gas Pipeline Project discussed in this Draft EIR, the CSLC has provided responses
35 to those comments that are applicable to this Project. Both Yolo County and
36 Sacramento County have received notices regarding the availability of the Draft EIR

1 and have been provided the opportunity to provide comments during the public
2 review period. The Yolo County Board of Supervisors has submitted comments on
3 the PG&E Line 406/407 Natural Gas Pipeline Draft EIR (refer to Comment Set H).
4 Sacramento County did not provide written comments.

5 **Response to Comments in Attachment A of Comment Set E:**

6 **Response to Comment E-3, Attachment A, Bullet 1** One of the Project objec-
7 tives is to install Project facilities in a safe, efficient, environmentally sensitive, and
8 cost-effective manner. An attempt has been made to locate the pipeline along
9 edges of agricultural fields. In some areas, the pipeline has been located through
10 agricultural fields in order to avoid placing the pipeline close to houses along the
11 roadways, and to avoid impacting additional trees that might be used for nesting by
12 numerous protected birds. As a part of the proposed Project, PG&E has increased
13 the soil cover beyond minimum requirements from 3 feet to 5 feet because its past
14 experience has demonstrated that this depth is sufficient to eliminate most threats
15 from agricultural operations, such as discing or deep-ripping.

16 **Response to Comment E-3, Attachment A, Bullet 2** As noted on page 2-1 of
17 the Draft EIR, HDD construction technique uses a hydraulically-powered horizontal
18 drilling rig to tunnel under vertically and/or horizontally-large sensitive surface
19 features such as water courses, levees, and wetlands. Table 2-5, beginning on
20 page 2-56 of the Draft EIR (as revised in this Revised Final EIR), indicates that
21 sensitive features with levees, such as the Knights Landing Ridge Cut, the West
22 Yolo Bypass/Drainage, East Yolo Bypass/Tule Canal, Sacramento River, and East
23 Levee Road would be crossed using HDD technologies. Table 2-1, on page 2-17 of
24 the Draft EIR indicates the depth at which these features would be crossed. The
25 protection of levees is discussed in Section 4.6, Geology and Soils, and Section 4.8,
26 Hydrology and Water Quality (refer to page 4.6-38 and pages 4.6-42 through 4.6-56,
27 and page 4.8-40 through 4.8-41 of the Draft EIR, respectively).

28 **Response to Comment E-3, Attachment A, Bullet 3** PG&E would coordinate
29 with landowners, tenant farmers, and adjacent property owners prior to and during
30 construction of the proposed pipeline in order to coordinate the construction
31 schedule with agricultural activities such as crop spraying, crop irrigation, and
32 harvest activities. For construction activities within rice fields, the proposed plan is
33 that PG&E work with landowners to isolate the right-of-way prior to the fall, so that
34 construction can begin on May 1 (or as soon as the field is sufficiently dry) without

1 interfering with the rice field preparation, planting, and flooding schedule (refer to the
2 Draft EIR, page 2-51).

3 **Response to Comment E-3, Attachment A, Bullet 4** PG&E requires that within
4 their 50-foot permanent easement, a 20-foot-wide corridor located in the center be
5 maintained free of deep rooted crops in order to perform routine maintenance
6 activities, such as annual patrolling (by foot or aerial patrol), cathodic protection and
7 other surveys. Other types of crops, such as row crops, field crops, and rice fields,
8 can be planted within that 20-foot-wide corridor. The pipeline is proposed to be
9 constructed with 5 feet of soil coverage in order to allow farming activities such as
10 discing or deep-ripping to continue within the entire easement. PG&E has increased
11 the soil coverage beyond minimum requirements from 3 feet to 5 feet because
12 PG&E's experience has demonstrated that this depth is sufficient to eliminate most
13 threats from agricultural operations. Excavations in excess of 5 feet present
14 additional construction challenges (and cost) due to the need for trench benching or
15 shoring for worker entry. In addition, the comment letter from the Yolo County Farm
16 Bureau (comment set Y) notes that "We appreciate that PG&E has decided to bury
17 the pipeline under 5 feet of dirt. This provides safety for agricultural operations
18 above the pipeline." See response to comment E-3, bullet 1, for discussion of depth
19 below crops.—With regard to constructing the pipeline beneath irrigation or drainage
20 ditches, PG&E will address depth on a site-by-site basis as these irrigation features
21 are encountered and determine, in consultation with the property owner, the
22 appropriate depth to place the pipeline.

23 **Response to Comment E-3, Attachment A, Bullet 5** For the length of the pro-
24 posed pipeline PG&E will likely encounter varying conditions that will require
25 consideration including soil types. Refer to Section 4.6, Geology and Soils, for a
26 discussion of soil types likely to be encountered in the Project area. This pipeline
27 occurs outside of the primary and secondary Delta and, therefore, peat soils are not
28 a concern with the proposed Project.

29 **Response to Comment E-3, Attachment A, Bullet 6** As discussed under the
30 heading "Pipe Buoyancy" on page 2-71 of the Draft EIR, PG&E would apply criteria
31 specified in DOT 49 CFR section 192.317 to protect the Project from flooding
32 hazards. For portions of the Project within the FEMA-designated 100-year flood
33 zone, PG&E would apply a factor of safety (FS) of 1.5 to decrease the downward
34 force of backfill acting on the pipe. In addition, a relative compaction of 80 percent
35 would be required to ensure the backfill would be stable during the first–winter
36 seasons. Soil conditions, pipe geometry, and depth of the HDD crossings are

1 sufficient to prevent buoyancy concerns of the HDD crossings. To address the
2 potential for scour within the Yolo Bypass, a concrete coating would be applied to
3 provide a downward force of 10 lbs/ft or 2-inch minimum thickness whichever is
4 greater.

5 **Response to Comment E-3, Attachment A, Bullet 7** PG&E will coordinate con-
6 struction of the proposed Project with all property owners and agencies and acquire
7 permits and approvals as required by the CPUC. As noted under Section 1.4,
8 Permits, Approvals, and Regulatory Requirements, in addition to the action by the
9 CSLC, the proposed Project may require encroachment permits from affected local
10 flood control or reclamation districts including the Sacramento, Yolo, Placer, and
11 Sutter Counties, Central Valley Flood Protection Board, Yolo-County Flood Control
12 and Water Conservation District and the Placer County Flood Control and
13 Conservation District.

14 **Response to Comment E-3, Attachment A, Bullet 8** PG&E has indicated that
15 they will not store or handle hazardous waste or materials within the project area in
16 quantities exceeding State thresholds. Therefore, they will not be preparing a
17 Business Emergency Response Plan and Inventory.

18 **Response to Comment E-3, Attachment A, Bullet 9** PG&E, as a CPUC-regu-
19 lated entity, is not required to adhere to county or city zoning or land use
20 designations, nor are they required to obtain discretionary permits from such
21 jurisdictions. However, PG&E may be required to obtain ministerial permits, such as
22 grading and encroachment permits, from affected counties, cities or other local
23 jurisdictions, such as reclamation districts. Furthermore, PG&E may be required to
24 obtain permits or approvals from certain reviewing authorities such as those listed in
25 Section 1.0, Introduction, under the heading 1.4 Permits, Approvals, and Regulatory
26 Requirements, beginning on page 1-8 of the Draft EIR.

27 **Response to Comment E-3, Attachment A, Bullet 10** The pipeline does not
28 pass through the City of Davis.

29 **E-4** As indicated on page 4.12-19 of Section 4.12, Population and
30 Housing/Public Services/Utilities and Service Systems, the purpose of the Project is
31 to support existing and approved future planned population growth in the Project
32 area. The proposed Project is intended to extend natural gas service to planned
33 residential and commercial developments in Placer, Sutter, and Sacramento
34 counties as approved by their respective General Plans and Specific Plans. General

1 Plans and Specific Plans are required to go through an environmental review
2 process. The General Plans of Yolo, Sutter, Sacramento and Placer counties and
3 the City of Roseville have been taken into account in the following sections: Section
4 4.9, Land Use and Planning, and Section 4.12, Population and Housing/Public
5 Services/Utilities and Service Systems. The proposed Project has no jurisdiction
6 over the approval of residential development. With the exception of six aboveground
7 stations, totaling 2.55 acres, the pipeline would be underground and following
8 installation, the temporary and permanent easement areas would be restored to pre-
9 construction conditions or in accordance with pre-arranged landowner requirements.

10 **E-5** PG&E is required by statute to procure 20 percent of its electricity from
11 renewable energy resources beginning in 2010. However, facilities with which
12 PG&E has executed power purchase agreements have not yet been built, and the
13 CPUC's rules of flexible compliance allow up to 3 years for deliveries to meet the
14 targets. PG&E expects to meet its 20 percent obligation with deliveries received
15 during the 3 years following 2010.

16 Nonetheless, an increase in the use of renewable sources of electricity is not
17 expected to eliminate the need for the proposed Project. The Project is necessary to
18 provide reliable natural gas service to existing core residential and small commercial
19 customers, and extend service to planned residential and commercial development
20 in Sacramento, Yolo, Sutter, and Placer Counties. A reduction in power generation
21 gas usage will have no effect on the need for additional pipeline capacity to serve
22 these customers.

23 PG&E's natural gas load growth forecasts for core residential and small commercial
24 customers are updated and scaled to reflect the use of readily available ENERGY
25 STAR® technologies in new home construction, and Energy-Efficiency Audits and
26 Rebates offered for existing homes and businesses. The extent to which these
27 energy efficiency measures have been used to reduce natural gas consumption has
28 been taken into account in PG&E's load growth forecast.

29 **E-6** Refer to response to comment E-4. As described on page 1-4 of the Draft
30 EIR. The CSLC is the State agency with jurisdiction and management control over
31 California's sovereign and submerged lands. This EIR will be used by the CSLC to
32 exercise its jurisdictional responsibilities in making its decision to grant a lease for
33 the pipeline river crossing at the Sacramento River.

34

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;

F-1

F-2

F-3

F-4

4. The pipeline could degrade the groundwater which we use via our wells for agricultural and domestic use; F-5

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. F-6

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: F-7

"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: F-8

"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.** F-9

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.

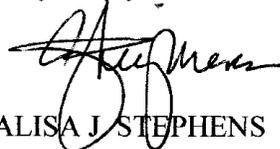
6. **Option D.** This route would shift a nearly 2-mile portion of the pipeline from bisecting 10 agricultural fields located between CR 17 and CR 19 to the agricultural field boundaries along CR 17. It is preferable to locate the pipeline along existing county roads than to bisect fields. The drawback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

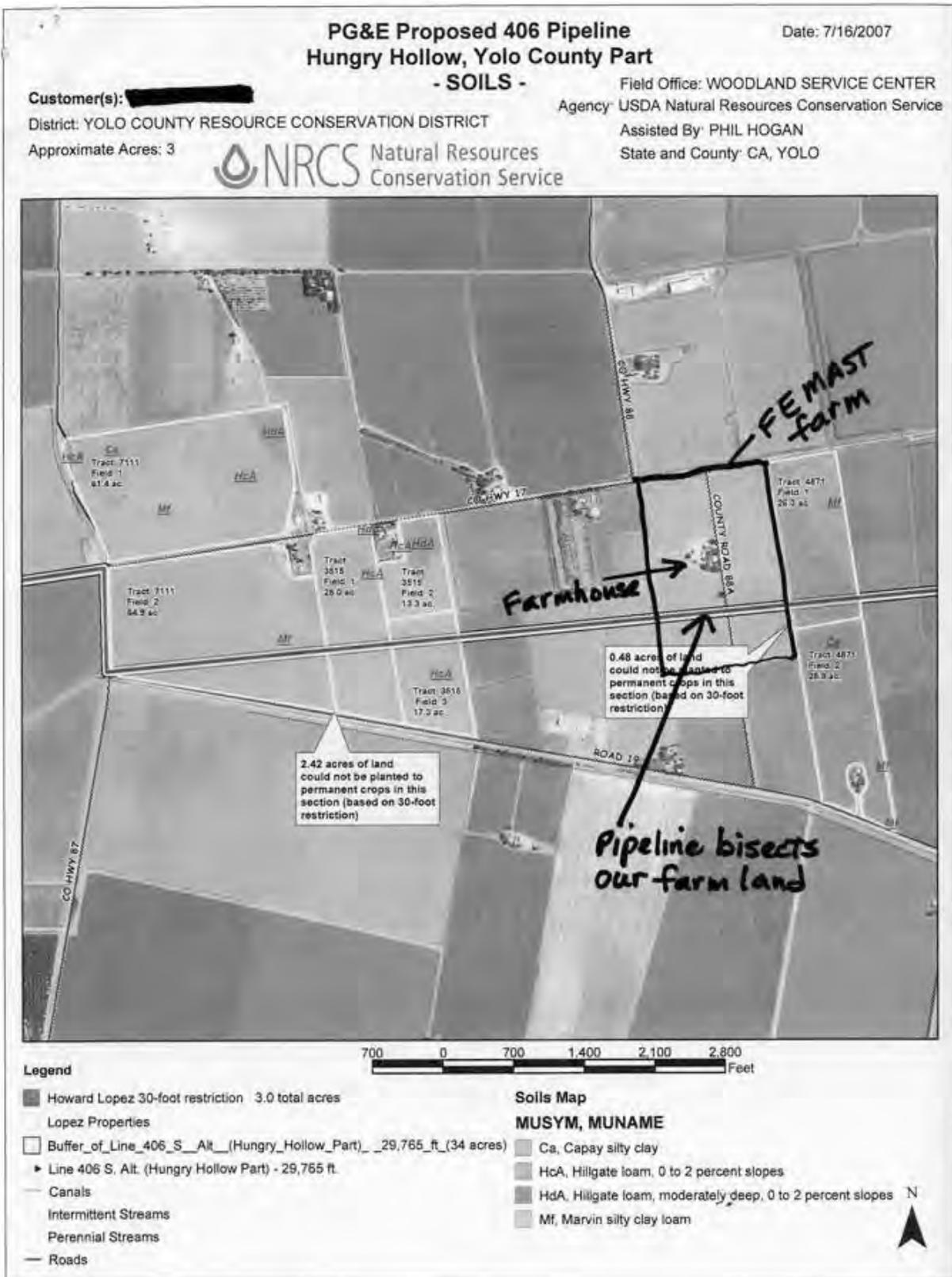
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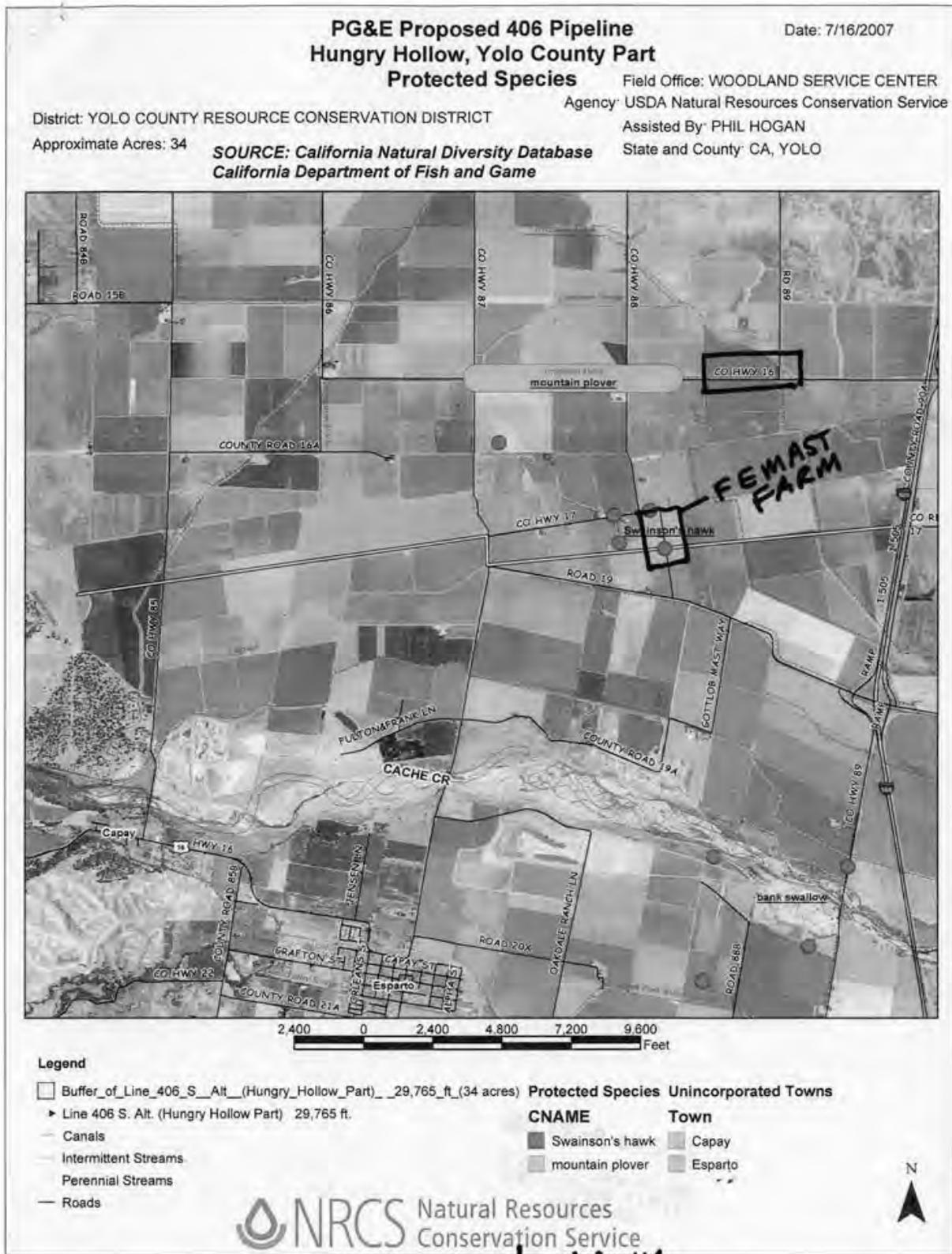
Cc: Ed Mast
Wilma Stephens Hill
Howard and Bonnie Lopez
Yolo County Farm Bureau

↑
F-9
Cont.

F-10

F-11





1 RESPONSE TO COMMENT SET F

2 **F-1** Please refer to responses to comments B-1, B-3, and B-4.

3 **F-2** Please refer to response to comment B-1.

4 **F-3** Please refer to response to comment B-1.

5 **F-4** Please refer to response to comment B-6. A revised System Safety and
6 Risk of Upset report was completed by EDM Services, Inc. for the proposed Project,
7 and is included as Appendix H-3 of this Revised Final EIR. The risk analysis was
8 revised because the aggregate risk was calculated and reported as individual risk.
9 In addition, the risk analysis incorrectly compared the aggregate risk to the individual
10 risk threshold. The individual risk significance threshold used in the Revised Final
11 EIR is an annual likelihood of one in one-million (1:1,000,000) for serious injury or
12 fatality (used by the California Department of Education for school sites). The risk
13 level is typically determined for the maximally exposed individual (assumes that a
14 person is present continuously—24 hours per day, 365 days per year).

15 The maximum risk posed by Line 406 in Yolo County before mitigation is
16 1:2,137,000, and after mitigation is 1:4,274,000 chances of fatality per year. The
17 highest risk along a segment of pipeline is to persons located immediately above the
18 pipeline, and the risk decreases as a person is farther away from the pipeline.
19 Because the calculated individual risk is less than the threshold of 1:1,000,000, the
20 risk is considered to be less than significant.

21 ~~Section 4.7, Hazards and Hazardous Materials, of the Draft EIR provides an analysis~~
22 ~~of the risks associated with the proposed pipeline based on the System Safety and~~
23 ~~Risk of Upset report was completed by EDM Services, Inc. for the proposed Project.~~
24 ~~This report is included as a part of Appendix H. Table 5.1.5-1 of the EDM report, as~~
25 ~~well as Table 4.7-6 on pages 4.7-34 and 4.7-35 of the Draft EIR, summarizes the~~
26 ~~potential consequences from fires and explosions at various distances from the~~
27 ~~proposed pipeline. As noted in the table, the consequences of an explosion at 1,260~~
28 ~~feet from the release are not anticipated to result in any injuries; for this case, 10~~
29 ~~percent window glass breakage would be anticipated with no injuries to building~~
30 ~~occupants. The consequences of a torch fire at 1,540 feet from the pipeline are not~~
31 ~~anticipated to cause detrimental impacts to humans from prolonged exposure. The~~
32 ~~consequences of an explosion from a release at 1,890 feet would include some~~
33 ~~glass breakage but no injuries to building occupants.~~

1 **F-5** Pages 4.8-11 through 4.8-13 of the Draft EIR discuss potential impacts to
2 water quality (see Section 4.8.5, Hydrology and Water Quality). As proposed in
3 APM HWQ-3 and APM HWQ-4, and APM BIO-20 and APM BIO-21, the Project
4 incorporates design features and construction techniques that reduce potential
5 impacts to groundwater flow to less than significant levels. As discussed in Impact
6 HWQ-2, the Project has the potential to interrupt or degrade groundwater used for
7 private or municipal purposes. Accordingly, MM HWQ-2 (as amended in this
8 Revised Final EIR) would required testing of wells identified as potentially at risk and
9 consultation with landowners, should wells be affected (please refer to page 4.8-21
10 through 4.8-22 of the Draft EIR). Implementation of MM HWQ-2 would ensure that
11 Project construction activities would avoid potential conflicts with private water wells,
12 irrigation wells, and water pipelines. Refer to section 4.0 of this Revised Final EIR
13 for revisions to the Draft EIR.

14 **F-6** Swainson's hawk and other special-status bird species are discussed in
15 Table 4.4-3 (refer to pages 4.4-30 through 4.4-38 of the Draft EIR and as amended
16 in this Revised Final EIR). Figure 4.4-2 shows California Natural Diversity Database
17 (CNDDDB). As discussed on page 4.4-33, Swainson's hawks were observed on
18 numerous occasions during surveys of the Project alignment, and suitable nesting
19 and foraging habitat was confirmed throughout the scattered trees, open grasslands,
20 and agricultural areas along the proposed alignment. Implementation of APMs BIO-
21 1 through BIO-19, APM BIO-29, APM BIO-30, and APM BIO-35, MM BIO-2a, MM
22 BIO-2b, MM BIO-4a, MM BIO-4b, MM BIO-4c, and MM BIO-4d would reduce
23 impacts to Swainson's hawk and other special-status bird species to less than
24 significant levels. As noted on pages 4.4-125 through 4.4-126, Options A and B,
25 portions of which would run along SR 16, would result in fewer potential impacts to
26 nesting birds. However, as discussed in the Executive Summary of the Draft EIR,
27 Options A and B would result in a greater magnitude of impacts to agricultural
28 resources, biological resources, cultural resources, soils, risk of upset hazards, land
29 use and traffic. Also, by placing the pipeline in close proximity to Durst Organic
30 Farmers, a new High Consequence Area (HCA) would potentially be created along
31 the pipeline as defined by DOT 192.903, based upon the number of employees and
32 the number of days they would congregate near the pipeline.

33 **F-7** As discussed on page ES-32, while Alternative Options A, B, C, D, E, and
34 G would result in similar impacts to agricultural resources as the proposed Project,
35 these options would reduce the number of agricultural fields that would be bisected
36 by the Project. However, implementation of these alternative options would result in

1 increased impacts associated with factors such as movement of the pipeline closer
2 to roadways, residences, and in some cases businesses, thereby increasing the
3 number of people that would be at risk if rupture of the pipeline were to occur with a
4 subsequent explosion and/or fire (resulting in an increase in the magnitude of the
5 societal risk). Please also refer to responses to comments B-1, B-3, B-4, B-5, and
6 E-3.

7 **F-8** The proposed alignment crosses through agricultural fields containing
8 crops only in locations where an alignment paralleling existing county road and farm
9 roads would not reduce the environmental impacts, including agriculture. If the
10 proposed pipeline were to follow a path along existing roadways rather than cross
11 through agricultural fields, the pipeline would still be located within the agricultural
12 fields along those roadways. There are jurisdictional requirements regarding the
13 distance from roadways that the pipeline must be located. Paralleling roadways
14 could result in an increase in the amount of land needed for the pipeline, and in
15 some cases bring the pipeline closer to residences. As an example, Options D and
16 E would increase the pipeline length by 860 and 3,480 feet, respectively, within
17 those agricultural fields paralleling the roadways.

18 The proposed Project use restrictions within the permanent easement would prohibit
19 the planting of deep-rooted plants, such as trees or vines, within 10 feet on either
20 side of the pipeline centerline (20 feet total within the permanent easement). This
21 would result in the limitation of crops grown on approximately 102 acres of farmland
22 within four counties to row crops, field crops, or any other crops that do not involve
23 deep-rooted plants. Most of the agricultural land along the proposed Project
24 alignment is currently used for row or field crops, and those types of uses would be
25 allowed to continue within the entire pipeline permanent easement once the pipeline
26 has been installed and the topsoil restored.

27 **F-9** Section 3.0 of the Draft EIR evaluates a number of alternative options
28 along the proposed pipeline alignment to reduce or avoid one or more impacts of the
29 proposed Project. This comment expresses a preference for the No Project
30 Alternative, Option A, Option F, Option B, Option E, and Option D, in that order.

31 The No Project Alternative means that PG&E would not construct/operate the
32 natural gas pipeline along the proposed route. This option would not meet the
33 Project objectives, and continued growth in Yolo, Sutter, Sacramento, and Placer
34 counties would put further strain on existing natural gas infrastructure, and could
35 result in emergency restriction or interruption of services.

1 Option A would increase the overall pipeline length by approximately 2,200 feet
2 through the edges of mostly agricultural fields, increasing the impacts to agricultural
3 lands including existing vineyards and orchards. Also, by placing the pipeline in
4 close proximity to Durst Organic Farmers, a new “high consequence area” or “HCA”
5 would potentially be created along the pipeline as defined by DOT 192.903, based
6 upon the number of employees and the number of days they would congregate
7 within a certain distance (646-foot impact radius) from the proposed pipeline.

8 Option F would not alter the length of the overall pipeline, but would result in
9 bisecting an agricultural field instead of extending along the edge of the field. This
10 option would increase the magnitude of impacts to biological resources by bordering
11 an ephemeral drainage with adjacent wetlands that the Project avoids.

12 Option B would increase the overall pipeline length by approximately 2,640 feet
13 through the edges of mostly agricultural fields, increasing the impacts to agricultural
14 lands including existing orchards. Also, by placing the pipeline in close proximity to
15 Durst Organic Farmers, a new “high consequence area” or “HCA” would potentially
16 be created along the pipeline as defined by DOT 192.903, based upon the number
17 of employees and the number of days they would congregate near the pipeline.

18 Option E would involve a minor realignment of the proposed Line 406 route to those
19 agricultural lands along County Road 16. This option would increase the overall
20 pipeline length by roughly 3,480 feet, along the edges of agricultural fields. This
21 option would impact more trees and would move the pipeline closer to residences
22 along County Road 16.

23 Option D would involve a minor variation to the proposed Line 406 route to those
24 agricultural lands along County Road 19. This option would increase the overall
25 pipeline length by roughly 860 feet through the edges of agricultural fields. This
26 option would need to take into consideration the ditch along County Road 19, would
27 impact an additional orchard, and would move the pipeline closer to residences
28 along the road.

29 The CSLC will make two decisions regarding the PG&E Line 406-407 Natural Gas
30 Pipeline Project at one of the CSLC’s public meetings. The first decision will be
31 whether to certify the EIR that was prepared for the proposed PG&E Line 406-407
32 Natural Gas Pipeline project. The second decision to be made by the CSLC will be
33 whether to approve the environmentally superior alternative proposed project, which
34 is construction of the PG&E Line 406-407 Natural Gas Pipeline, inclusive of all

1 project components and Options I and L. The CSLC could also choose at that time
2 to approve any of the other options and any alternatives that were analyzed in the
3 EIR. A notice of the date, time, and location of the public meeting where the Project
4 will be considered by the Commissioners will be mailed to everyone on the CLSC
5 mailing list and to everyone who has commented on the Draft EIR, at a minimum of
6 10 to 15 days prior to the date of the meeting.

7 **F-10** Please refer to responses to comments B-1 and B-3.

8 **F-11** Please refer to response to comment F-9.

9



Center Joint Unified School District

8408 Watt Ave., Antelope, CA 95843
916-338-6337 or 916-338-6417
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SUPERINTENDENT

Dr. Kevin Jolly, Ed.D

Comment Set G
Page 1 of 6

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)

G-1

“Proud of the Past, Planning for the Future”

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.

G-2

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.

G-3

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.

G-4

"Proud of the Past, Planning for the Future"

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.

G-5

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.

G-6

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.)

G-7

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.)

G-8

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 “Proud of the Past, Planning for the Future”

“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.”

↑
G-8
Cont.

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.)

G-9

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.

G-10

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:

G-11

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.)

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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

"Proud of the Past, Planning for the Future"

↑
G-11
Cont.
G-12
G-13
G-14
↓

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

↑ G-14
Cont.

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.

G-15

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.

G-16

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.

G-17

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

"Proud of the Past, Planning for the Future"

1 RESPONSE TO COMMENT SET G

2 **G-1** The commenter provided background information regarding the location of
3 planned and proposed schools in the Placer Vineyards Specific Plan (PVSP) and the
4 Sierra Vista Specific Plan (SVSP) areas. The proposed Line 407 is intended to
5 serve the PVSP (approved by Placer County Board of Supervisors on July 16,
6 2007), and the SVSP (still in the planning stages).

7 Within the approved PVSP are seven dedicated school sites that will be developed
8 by the Center Joint Unified School District. School sites are also proposed to be
9 included in the SVSP, and a land use plan shows five proposed school site
10 locations. Two dedicated school sites within the PVSP (one high school and one
11 elementary school) are located within 1,500 feet of the proposed Project pipeline.
12 The commenter states that the planned high school site is located within 50 feet of
13 the proposed pipeline, and the planned elementary school is located within 1,400
14 feet of the proposed pipeline. The commenter also states that one proposed school
15 site within the SVSP (elementary school) is located approximately 1,500 feet north of
16 the proposed Project pipeline.

17 As noted in Table 4.7-6 of the revised risk analysis attached to the Revised Final
18 EIR as Appendix H-3, the impacts are very minor at distances greater than 800 to
19 1,000 feet. Since the planned elementary school site boundaries within the PVSP
20 and the SVSP are located 1,400 feet and 1,500 feet, respectively, from the proposed
21 pipeline, it is unlikely that serious risks would be posed to the student body. At this
22 distance from the pipeline, the consequences from a potential fire or explosion are
23 not expected to result in any injuries. Since the SVSP is still within the planning
24 stages, the proposed schools sites can be moved to locations outside of the school
25 district recommended safety buffer prior to finalizing that plan.

26 The location of the PVSP schools were considered in the Draft EIR (please refer to
27 pages 4.7-5, 4.7-6, and 4.9-1). Alternative Option I, Option J, Option K, and Option
28 L were considered in order to reduce risks to the proposed school sites (please refer
29 to pages 3-55 through 3-57 of the Draft EIR). The impacts of these options in
30 regards to the proposed school sites are discussed under Impacts of Alternatives in
31 Section 4.7, Hazards and Hazardous Materials, and Section 4.9, Land Use and
32 Planning (please refer to page 4.7-42 through 4.7-45 and 4.9-29 through 4.9-31 of
33 the Draft EIR, as revised in Section 4.0 of this Revised Final EIR).

34 **G-2** In the Executive Summary of the Draft EIR and in Sections 4.3, Air
35 Quality; 4.7, Hazards and Hazardous Materials; 4.9, Land Use and Planning; and

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

13 Alternative Options I, J, K, and L were developed to attempt to reduce the magnitude
14 of risks to two planned school sites within the PVSP area. Options I and J looked at
15 moving the pipeline to a distance greater than 1,000 feet from the school site, based
16 on the results of a risk analysis, so as to reduce the risk to the school population if a
17 pipeline leak were to occur resulting in a fire or explosion. As noted in Table 4.7-6 of
18 the revised risk analysis attached to the Revised Final EIR as Appendix H-3, the
19 impacts are very minor at distances greater than 800 to 1,000 feet. At this distance
20 from the pipeline, the consequences from a potential fire or explosion are not
21 expected to result in any injuries. Therefore, Option I routes the pipeline
22 approximately 1,550 feet from the planned high school site to move the pipeline
23 outside the CDE study zone and reduce the risk, and would place the pipeline within
24 agricultural fields. Option J would move the pipeline even further from the planned
25 high school, but would move the pipeline closer to residences. Moving the pipeline
26 to a distance of 1,550 feet from the planned high school is adequate since the risk
27 analysis shows that no fatalities or injuries are expected to occur if a pipeline release
28 and subsequent fire or explosion were to result at a distance greater than 1,000 feet
29 from the pipeline.

30 Option K places the pipeline route outside the 1,500-foot study zone, while Option L
31 has the construction of the pipeline within the proposed alignment for Line 407-E,
32 within the 1,500-foot study zone, but at a depth of 35 feet to reduce the magnitude of
33 the risk to the planned elementary school. In Option L, PG&E would use HDD to
34 place the pipeline at this increased depth (approximately 35 feet deep). PG&E has
35 also proposed to jointly develop a risk analysis with the School District to determine
36 pipeline impacts to the school (refer to APM ALT-L) as a part of Option L. Since the

1 planned elementary school site would be located 1,400 feet from the pipeline, it is
2 already at an adequate distance from the pipeline that no fatalities or injuries are
3 expected to occur if a pipeline release and subsequent fire or explosion were to
4 result. Therefore, moving the pipeline another 150 feet (as in Option K) from the
5 planned elementary school and impacting wetlands and vernal pools is not
6 necessary. Increasing the length of the HDD in the area of the planned elementary
7 school would serve to reduce the risks of third-party damage and serve to further
8 reduce the safety risks to the school.

9 **G-3** Please refer to response to comment G-2.

10 **G-4** The Center Joint Unified School District has indicated a preference for
11 Option J over Option I. Section 3.0 of the Draft EIR evaluated a number of
12 alternatives or options along the proposed pipeline alignment to reduce or avoid one
13 or more impacts of the proposed Project. Both alternative options would have
14 greater impacts to biological resources but these impacts could be mitigated to less
15 than significant levels. Both options would meet all of the basic Project objectives
16 and would increase the distance of the pipeline from a planned high school along
17 Baseline Road. However, Option J would place the pipeline close to several
18 residences, while Option I would go through agricultural fields.

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

31 **G-5** The Center Joint Unified School District has indicated a preference for
32 Option K over Option L. Both options were considered due to proximity to the
33 planned elementary school site in the PVSP area. Option K places the pipeline
34 route outside the 1,500-foot study buffer zone, while Option L has the construction of
35 the pipeline within the proposed alignment for Line 407-E, within the 1,500-foot

1 ~~buffer study zone~~, but at a depth of 35 feet to reduce the magnitude of the risk
2 potential to the planned school. In Option L, PG&E would use HDD to place the
3 pipeline at this increased depth (approximately 35 feet deep). PG&E has proposed
4 to jointly develop a risk analysis with the School District to determine pipeline
5 impacts to the school (refer to APM ALT-L).

6 Option K would increase impacts to biological resources by placing the pipeline
7 within an area that has wetlands, vernal pools, and giant garter snake habitat. While
8 Option L would not increase or decrease any of the impacts associated with the
9 proposed pipeline, Option L was designed to decrease the magnitude of the risks to
10 the planned elementary school and minimize impacts to biological resources that
11 would result from implementing ~~one of the~~ other alternative option at this location.

12 In addition, please review Letter P from Hefner, Stark and Marois, representing
13 Placer Vineyards Development Group, LLC, who indicate in comment P-8 that there
14 is flexibility in the PVSP with regard to the elementary school. The comment
15 indicates that “there may be some ability to relocate the elementary school site
16 further south away from the pipeline by swapping the adjacent park site with the
17 school site, thereby increasing the distance of the school site from Baseline Road to
18 greater than 1,500 feet.”

19 **G-6** Section 15126.6 of the CEQA Guidelines states, “...an EIR shall describe
20 a range of reasonable alternatives to the project or the location to the project, which
21 would feasibly attain most of the basic objectives of the project but would avoid or
22 substantially lessen any of the significant effects of the project, and evaluate the
23 comparative merits of the alternatives. An EIR need not consider every conceivable
24 alternative to a project. Rather, it must consider a reasonable range of potentially
25 feasible alternatives that will foster informed decision making and public
26 participation...” With regard to proximity to the planned elementary school site, the
27 CSLC has considered a reasonable range of alternatives including the No Project
28 Alternative, Option I, Option J, Option K, and Option L. The comment identified one
29 alternative to be considered, the utilization of multiple smaller pipelines to deliver gas
30 in lieu of the high pressure pipeline on Baseline Road, and to locate these away
31 from school sites.

32 The primary design objective of the Project is to increase the capacity of the overall
33 local transmission pipeline network serving the greater Sacramento Valley Region,
34 including West Placer, Sacramento, and El Dorado counties. To meet this design
35 objective, Line 407 must be large enough in diameter and operate at high enough

1 pressure to function as a major rib extension from PG&E's backbone pipeline
2 system (Line 400 and Line 401) to transport gas from Line 406 into 12-inch/16-
3 inch/24-inch Line 123 operating at 500 psig in West Placer County, and 12-inch/16-
4 inch Line 119 operating at 500 psig in Sacramento County.

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

12 To replace the capacity of 30-inch Line 407, PG&E would need to install either two
13 parallel 24-inch transmission pipelines, or four parallel transmission pipelines
14 consisting of two 20-inch and two 16-inch pipelines, all operating at the same MAOP
15 as Line 407. Installing multiple smaller diameter pipelines in lieu of a single 30-inch
16 pipeline would increase the mileage of pipelines within the project area and would
17 increase the impact on the environment, the risk of serious injury and fatality, as well
18 as the cost of serving the load growth projected on the system.

19 The volume of gas that can flow through a pipeline depends primarily on the
20 operating pressure differential, the pipe diameter, and the length of the pipeline.
21 When the operating pressure or pipe diameter is reduced, the natural gas flow rate
22 is also reduced. As a result, a reduction in the line diameter would require higher
23 pressures in order to flow the required 180,000,000 cubic feet of natural gas per day.
24 On the other hand, a reduction in the operating pressure would require a larger
25 diameter line (or multiple lines) in order to flow the same volume. Specifically, a 30-
26 inch line will flow nearly 20 times more natural gas than a 10-inch diameter line
27 operating under similar conditions. In other words, almost twenty 10-inch diameter
28 lines would be required to flow the same volume of natural gas as a single 30-inch
29 line.

30 It is clear that substituting numerous smaller diameter natural gas transmission lines
31 in a similarly developed residential and commercial area would pose a much higher
32 risk to the public than the proposed single 30-inch diameter transmission line.
33 Although the actual results would depend on the population density and other
34 factors, the use of numerous (roughly 20) 10-inch diameter lines would pose a risk

1 on the order of 10 to 15 times that of a single 30-inch line flowing an equivalent
2 volume of natural gas.

3 **G-7** The CSLC recognizes that the Center Joint Unified School District
4 supports Option I. Please refer to response to comment G-4.

5 **G-8** CSLC recognizes Center Joint Unified School District's preference for
6 Option J. Please refer to response to comment G-4.

7 **G-9** CSLC recognizes Center Joint Unified School District's preference for
8 Option K. Please refer to response to comment G-5.

9 **G-10** ~~A risk analysis was completed for the proposed Project pipeline and all
10 alternative options. Alternative Option L would significantly reduce or eliminate the
11 likelihood of the line being damaged by third parties since the line would be installed
12 using HDD techniques, well below normal excavation depths.~~

13 The Revised Final EIR provides an analysis that has been clarified to account for
14 individual risks to the public due to the potential for fires and explosions, which may
15 result from pipeline releases. The risk assessment included risk measurement
16 terminology that was not defined in earlier versions of the document, which has
17 resulted in some confusion. A revised System Safety and Risk of Upset report was
18 completed by EDM Services, Inc. (October 2009) for the proposed Project, and is
19 included as Appendix H-3 of this Revised Final EIR.

20 The risk analysis was revised because the aggregate risk was calculated and
21 reported as individual risk. In addition, the risk analysis incorrectly compared the
22 aggregate risk to the individual risk threshold of an annual likelihood of fatality of
23 1:1,000,000. The individual risk is defined as the frequency that an individual may be
24 expected to sustain a given level of harm from the realization of specific hazards, at
25 a specific location, within a specified time interval (measured as the probability of a
26 fatality per year). Aggregate risk is the total anticipated frequency of fatalities that
27 one might anticipate over a given time period for all of the project components (the
28 entire pipeline system). There is no known established threshold for aggregate risk.

29 The individual risk significance threshold used in the EIR is an annual likelihood of
30 one in one-million (1:1,000,000) for fatality (used by the California Department of
31 Education for school sites). The risk level is typically determined for the maximally
32 exposed individual (assumes that a person is present continuously—24 hours per
33 day, 365 days per year).

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

7 As noted in Table 4.7-6 of the revised risk analysis attached to the Revised Final
8 EIR as Appendix H-3, the impacts are very minor at distances greater than 800 to
9 1,000 feet. Since the planned elementary school site boundary is located
10 approximately ~~1,350~~ 1,400 feet from the proposed pipeline alignment, it is unlikely
11 that serious risks would be posed to the student body. At this distance from the
12 pipeline, the consequences from a potential fire or explosion are not expected to
13 result in any injuries. Option K would increase the magnitude of potential impacts to
14 wetland features while not decreasing the risk. Option K would cross an additional
15 vernal pool, vernal swale, seasonal swales, and seasonal wetland features and
16 potentially result in direct impacts to special-status vernal pool branchiopods and
17 plant species (refer to page 4.4-133 of the Draft EIR). Also, please see responses to
18 comments F-4 and G-5.

19 **G-11** As noted in Section 3.0 of the Draft EIR, a Northern Alternative (located
20 north of the Center Joint Unified School District's proposed school sites) was
21 considered but ultimately rejected from full evaluation. As discussed on page 3-6 of
22 the Draft EIR, this alternative was eliminated because it would expose the proposed
23 pipeline to the greatest risk from fault rupture, and result in greater impacts to
24 biological resources, particularly vernal pool habitat, involve more than 40 waterway
25 crossings, and impact local agricultural production more extensively than the
26 proposed Project. Furthermore, the alternative would locate the natural gas supply
27 further from many of the developments that are planned in the area that would
28 receive service from the pipeline.

29 The Draft EIR fully evaluated four options to address the proposed Project's
30 proximity to the future school sites: Option I, Option J, Option K, and Option L. Refer
31 to responses to comments G-1, G-4, G-5, and G-10.

32 **G-12** ~~PG&E plans to install remotely operated valves at the Capay Metering~~
33 ~~Station and the Yolo Junction Pressure Limiting Station, which would help to control~~
34 ~~the flow of gas into Lines 406 and 407. PG&E will be required to also install~~
35 automatic shutdown valves in ~~three~~ all locations: Capay Metering Station, Yolo

1 Junction Station, Powerline Road Main Line Valve Station (which includes the Riego
2 Road Regulating Station), Baseline/Brewer Road Main Line Valve Station, and
3 Baseline Road Pressure Regulating Station.

4 The required DOT regulations, along with PG&E Project features that meet and
5 exceed the minimum requirements, would reduce risks of project upset. Even
6 though the project risk impacts are less than significant, additional measures shall
7 be implemented to further reduce risks of project upset. MM HAZ-2a and MM HAZ-
8 2b have been revised. Refer to Section 4.0 of this Revised Final EIR for revisions to
9 the Draft EIR.

10 ~~These measures include the use of modern pipe, regular internal inspections using a~~
11 ~~high resolution instrument (smart pig), corrosion mitigation, and the installation of~~
12 ~~automatic or remotely operated shut-down valves.~~

13 **G-13** Please see responses to comments G-4 and G-5 for discussion of Options
14 I through L. Methane sensors are not generally recommended because emission
15 levels under normal pipeline operations should not be considered hazardous to the
16 public. Per CPUC regulations, PG&E odorizes its natural gas. The level of
17 odorization is such that it is generally detectable by human smell below levels that
18 are considered hazardous. PG&E also performs leak surveys on its pipelines on
19 either an annual or semi-annual basis, and hazardous leaks are repaired promptly.

20 With regard to the implementation of a “emergency hazardous materials release
21 response action plan,” PG&E will prepare and implement a hazardous substance
22 control and emergency response plan as outlined in APM HAZ-2 and HAZ-6. The
23 Mitigation Monitoring Plan (MMP) must be adopted with approval of the Project and
24 certification of the EIR. The MMP includes monitoring and reporting procedures that
25 PG&E, the CSLC, or the County CUPA must carry out.

26 **G-14** All pressure regulating stations are located further than one-quarter mile
27 (1,320 feet) from existing and proposed school sites. Within the Center Joint Unified
28 School District, the Baseline Road Pressure Regulating Station would be located
29 approximately 2,790 feet from the existing Coyote Ridge Elementary School (within
30 Roseville’s city limits) and approximately 3,170 feet from the closest planned school
31 site. The Baseline/Brewer Main Line Valve Station would be located approximately
32 1,340 feet from the parcel boundary of a proposed high school site located in the
33 PVSP. As described on pages 4.7-30 through 4.7-31 in Section 4.7, Hazards and
34 Hazardous Materials, PG&E has indicated that a Public Safety Information Program

1 will be implemented during operation of the pipeline. As indicated on page 2-83
2 through 2-85 of the Draft EIR, PG&E would respond to emergencies in accordance
3 with PG&E's Gas System Maintenance and Technical Support Emergency Plan
4 Manual. This manual contains procedures, including pre- and post-emergency
5 planning, on-scene response, and incident reports that are followed in the event of
6 an emergency, to ensure prompt and effective response. Procedures within the
7 manual have been designed in accordance with State and Federal regulations,
8 including 40 CFR Part 265, Health and Safety Code (Chapter 6.95), and titles 19,
9 22, and 27 of the California Code of Regulations. The manual is reviewed annually
10 with local agencies to ensure that it is current and that all personnel understand the
11 plan and their responsibilities (please refer to Section 2.8, Project Description,
12 subheading 2.8.1, Public Safety).

13 **G-15** ~~Please refer to response to comment G-13 regarding methane detectors.~~
14 Pages 4.12-8 and 4.12-9 of the Draft EIR have been revised to correctly describe
15 the Center Joint Unified School District. Furthermore, a discussion of the Elverta
16 Joint School District has been added to correctly reflect school districts serving the
17 Project area. Refer to Section 4.0 of the Revised Final EIR for revisions to the Draft
18 EIR.

19 **G-16** References to the Placer County Unified School District on pages 4.13-19,
20 4.13-23 and 4.13-24 of the Draft EIR referring to the Placer County Unified School
21 District have been revised to refer to the Center Joint Unified School District. Refer
22 to Section 4.0 of the Revised Final EIR for revisions to the Draft EIR.

23 **G-17** The commenter provides text summarizing the comment letter. See
24 responses to comments G-1 through G-16.

25



County of Yolo

BOARD OF SUPERVISORS

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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.

H-1

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

H-2

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. | H-2
Cont.

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. | H-3

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. | H-4

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. | H-5

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. | H-6

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. | H-7

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

1 **RESPONSE TO COMMENT SET H**

2 **H-1** PG&E will work with landowners and local agencies regarding the
3 construction of the pipeline Project. The Draft EIR identifies existing agricultural or
4 commercial/industrial yards that may be utilized during the construction of the
5 proposed Project. PG&E would be required to work with the County on compatibility
6 with local land use issues and existing permits. Also, PG&E will obtain ministerial
7 permits for discreet locations where required.

8 **H-2** PG&E has reduced the permanent easement restricted use area to 10 feet
9 on either side of the pipeline, which is a total of 20 feet. The acreage of orchards
10 converted to other types of crops would now be a total of 2.0 acres. Pages 4.2-24
11 and 4.2-25 in the Draft EIR have been revised. Refer to Section 4.0 of the Revised
12 Final EIR for revisions to the Draft EIR.

13 Attempting to determine that future uses of farmland currently planted in field or row
14 crops would be converted to orchard or vineyard is too speculative for evaluation.
15 The temporary impacts to the 511 acres of farmland would not result in a physical
16 change to the environment for more than three weeks in any one area, or in the case
17 of HDD, for more than four weeks. In addition, the amount of farmland permanently
18 removed (2.55 acres) across all four counties, and the amount of farmland converted
19 from deep-rooted plants to other types of crops (2.0 acres of orchard loss) located
20 within Yolo County does not represent a significant regional loss. In addition, it is
21 not an uncommon practice to plant commercial cover crops in vineyards and
22 orchards between the rows, such as fava beans. Such shallow-rooted crops would
23 be allowed within the 10 feet on either side of the pipeline.

24 **H-3** Comment acknowledged. MM BIO-2a on page 4.4-89 of the Draft EIR
25 has been revised to require consultation with Yolo County's Natural Communities
26 Conservation Plan / Habitat Conservation Plan Joint Powers Agency manager prior
27 to the removal or disturbance of trees or vegetation and before construction of
28 aboveground facilities. Page 4.4-57 of Section 4.4 has been revised to include a
29 discussion of the Yolo County Natural Heritage Program. Refer to Section 4.0 of the
30 Revised Final EIR for revisions to the Draft EIR.

31 **H-4** PG&E has indicated that they will notify local jurisdictions of the final
32 permanent 50-foot right-of-way and pipeline location prior to the commencement of
33 construction. ~~The CSLC will make two decisions regarding the PG&E Line 406-407~~
34 ~~Natural Gas Pipeline Project at one of the public meetings. The first decision will be~~
35 ~~whether to certify the EIR that was prepared for the project. The second decision to~~

1 ~~be made by the CSLC will be whether to approve the proposed project, which is~~
2 ~~construction of the PG&E Line 406-407 Natural Gas Pipeline, and any alternatives~~
3 ~~that were analyzed in the Draft EIR. A notice of the date, time, and location of the~~
4 ~~public meeting where the Project will be considered by the Commissioners will be~~
5 ~~mailed to everyone on the CLSC mailing list and to everyone who has commented~~
6 ~~on the Draft EIR, at a minimum of 10 to 15 days prior to the date of the meeting. The~~
7 ~~Commission meeting record will contain the discussion and decision and the record~~
8 ~~will be placed on the website.~~

9 **H-5** PG&E has indicated that they coordinate with County Public Works
10 representatives on an ongoing basis as needed to ensure that County road
11 construction and/or improvement projects are not adversely impacted by PG&E's
12 gas line easements adjoining County rights-of-way (ROW). While the commenter
13 suggests that a 50-foot buffer between the edge of County roadways and PG&E
14 easements should exist, most County Public Works departments acknowledge that
15 sufficient clearances exist for maintenance of each parties' respective facilities (gas
16 lines and roads) where the public utility easement adjoins the edge of the ROW.
17 Agricultural landowners argue that placement of a gas line easement 50 feet from
18 the edge of roadway, within their fields, creates the potential for a 50-foot severance
19 strip in their fields, for which extra compensation must be paid to them. Different
20 environmental and economic factors also come into play when deciding to locate a
21 gas line easement 50 feet from the edge of an existing roadway easement, such as
22 the existence of wetlands or other environmental or economic factors. All of this
23 requires that final decisions on placement of the gas line easement be made on an
24 overall Project design basis.

25 Where PG&E's gas line easement runs parallel and contiguous to a County road,
26 the gas line will be located in the center of a 50-foot easement, putting the gas line
27 itself between 20 and 25 feet from the edge of the County ROW. County ROWs, in
28 agricultural areas such as where the Project is located, are typically between 60 feet
29 and 120 feet wide. The paved portions of roadways typically only occupy
30 approximately 20 feet in the center of these rights of way. As a result, where
31 PG&E's gas line easement runs parallel and contiguous with the County's ROW, the
32 gas line will usually be located between approximately 45 feet and 65 feet from the
33 edge of the paved roadway. Such clearances should be more than sufficient for the
34 proper maintenance and repair of the roadways and gas lines within the Project
35 area.

1 **H-6** Yolo County is listed as a reviewing authority or regulatory agency in
2 Section 1.0, Introduction, subsection 1.4, Permits, Approvals, and Regulatory
3 Requirements. PG&E holds a franchise agreement with Yolo County for the “Laying,
4 constructing and maintaining gas pipes, mains and appurtenances, dated June 7,
5 1948, Ordinance Number 212.” PG&E has agreed to coordinate with Yolo County
6 inspectors to ensure compliance with encroachment permit conditions.

7 **H-7** PG&E intends to place pipeline markers at all road and ditch crossings
8 indicating the location of the high-pressure gas lines. Additionally, pipeline markers
9 will be spaced such that the next marker is within line of sight or no more than ½
10 mile away in accordance with DOT 192.707. Placement of pipeline markers may be
11 impractical within class 3 and 4 areas because of street improvements, traffic, and
12 landscaping and negative visual impacts. If so, PG&E will seek approval from
13 property owners or the governmental agency involved prior to placing the markers.

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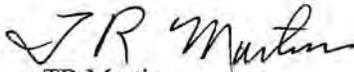
June 3, 2009

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)?

I-1

Sincerely,


TR Martin