

1 RESPONSE TO COMMENT SET I

2 **I-1** Section 3.0 of the Draft EIR provides a discussion of alternatives that were
3 considered but eliminated from further evaluation (refer to Figure 3-1 of the Draft
4 EIR). One of the main reasons for not locating the pipeline in the foothills is that it
5 increases the risk of pipeline rupture due to faults and placing the pipeline within
6 side-hills in that geographic area. One alternative included a northern route
7 alternative. While this alternative would locate the pipeline in a less populated area,
8 this alternative was eliminated from further evaluation because: 1) it would expose
9 the proposed pipeline to the greatest risk from fault rupture due to much of the
10 proposed right-of-way for the pipeline being located on side-hills adjacent to the
11 county roads; 2) greater impacts to biological resources; more than 40 waterway
12 crossings; and 3) impacts to local agricultural production would be more extensive
13 than the proposed project. A second alternative included a southern route. This
14 alternative was eliminated from further evaluation because: 1) it would require
15 crossing Cache Creek and more tributaries of Steelhead Creek; 2) would require
16 longer crossings over agricultural lands; and 3) would affect more people due to
17 construction through the suburban communities of North Natomas and Elverta. A
18 third alternative included a central route. This alternative was eliminated from further
19 evaluation because it would cause significant impacts to local water features and to
20 habitat utilized by special-status species.

21 Section 3.0 of the Draft EIR also evaluates a number of alternative options along the
22 proposed pipeline alignment to reduce or avoid one or more impacts of the proposed
23 Project. The proposed alignment crosses through agricultural fields containing crops
24 only in locations where an alignment paralleling existing county road and farm roads
25 would not reduce the environmental impacts, including those to agriculture. If the
26 proposed pipeline were to follow a path along existing roadways rather than cross
27 through agricultural fields, the pipeline would still be located within the agricultural
28 fields along those roadways. There are jurisdictional requirements regarding the
29 distance from roadways that the pipeline must be located. Paralleling roadways
30 could result in an increase in the amount of land needed for the pipeline, and in
31 some cases bring the pipeline closer to residences. As an example, Options D and
32 E would increase the pipeline length by 860 and 3,480 feet, respectively, within
33 those agricultural fields paralleling the roadways.

34 Please also refer to responses to comments B-1, B-3, and B-4.

35

DEPARTMENT OF TRANSPORTATION

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June 11, 2009

Comment Set J
 Page 1 of 1

09YOL0017
 03-YOL/SUT-Various
 Pacific Gas and Electric (PG&E) Line 406/407 Project
 Draft Environmental Impact Report

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

Dear Ms. Spurr,

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

- Any pipeline work to be performed within Caltrans Right of Way will require an Encroachment Permit. For permit assistance please contact Encroachment Permits Central Office at (530) 741-4403. J-1
- A Traffic Management Plan (TMP) should be prepared and submitted for Caltrans review to minimize traffic impacts to the State Highways during construction of the pipeline. The traffic control plan should discuss the expected dates and duration of construction, as well as traffic mitigation measures. We recommend that to the extent possible, the applicant should limit truck trips during morning and evening peak traffic periods (6-9 AM and 3-6 PM) to avoid exacerbating congestion. For TMP assistance, please contact John Holzhauser at (916) 859-7978. J-2

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

Sincerely,

ALYSSA BEGLEY, Chief
 Office of Transportation Planning - South

"Caltrans improves mobility across California"

1 **RESPONSE TO COMMENT SET J**

2 **J-1** CSLC acknowledges that an encroachment permit for work within
3 Caltrans' right-of-way will be required. Page 1-8 of the Draft EIR includes Caltrans
4 in the list of reviewing authorities and regulatory agencies (refer to Section 1.0,
5 Introduction). As stated on page 4.13-8 of Section 4.13, Transportation and Traffic,
6 APM TRANS-2 and APM TRANS-3 indicate that PG&E will obtain encroachment
7 permits from Caltrans, as well as Yolo, Sutter, Sacramento, and Placer counties.
8 Furthermore, a Traffic Management Plan will be prepared prior to the issuance of
9 encroachment permits and is subject to the local jurisdiction's review and approval.
10 Accordingly, any work performed within Caltrans right-of-way would be conducted
11 under an encroachment permit.

12 **J-2** As indicated in response to comment J-1, a Traffic Management Plan will
13 be prepared and provided to Caltrans for review and approval.

14 As indicated in APM TRANS-3 construction of the pipeline and associated truck trips
15 would occur for 10 hours a day, 6 days a week, unless otherwise permitted by the
16 local jurisdiction. As indicated on page 4.13-20 of the Draft EIR, approximately 80
17 vehicle trips are expected to occur daily as a result of the Project. These trips would
18 include all construction-related commuting and hauling of equipment and would not
19 simultaneously occur during peak traffic periods of 6 to 9 A.M. and 3 to 6 P.M.

20 PG&E is required to obtain permits from Caltrans where the pipeline crosses state
21 highways. This occurs at Highway 505, Interstate 5, and Highway 70/99. PG&E will
22 utilize HDD construction methods to minimize traffic impacts at those crossing
23 locations.

24



Community Development
 311 Vernon Street
 Roseville, California 95678-2649

June 10, 2009

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

Via: Email and Regular Mail

spurr@slc.ca.gov

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

Dear Ms. Spurr:

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

Hazard/Land Use Compatibility

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

K-1

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

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

K-2

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

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



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

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



K-2
(Cont.)

K-3

K-4

Aesthetics

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



K-5

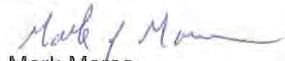
*Crystal Spurr, Project Manager
PG&E Line 406 and 407 Project – draft EIR Comments*

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

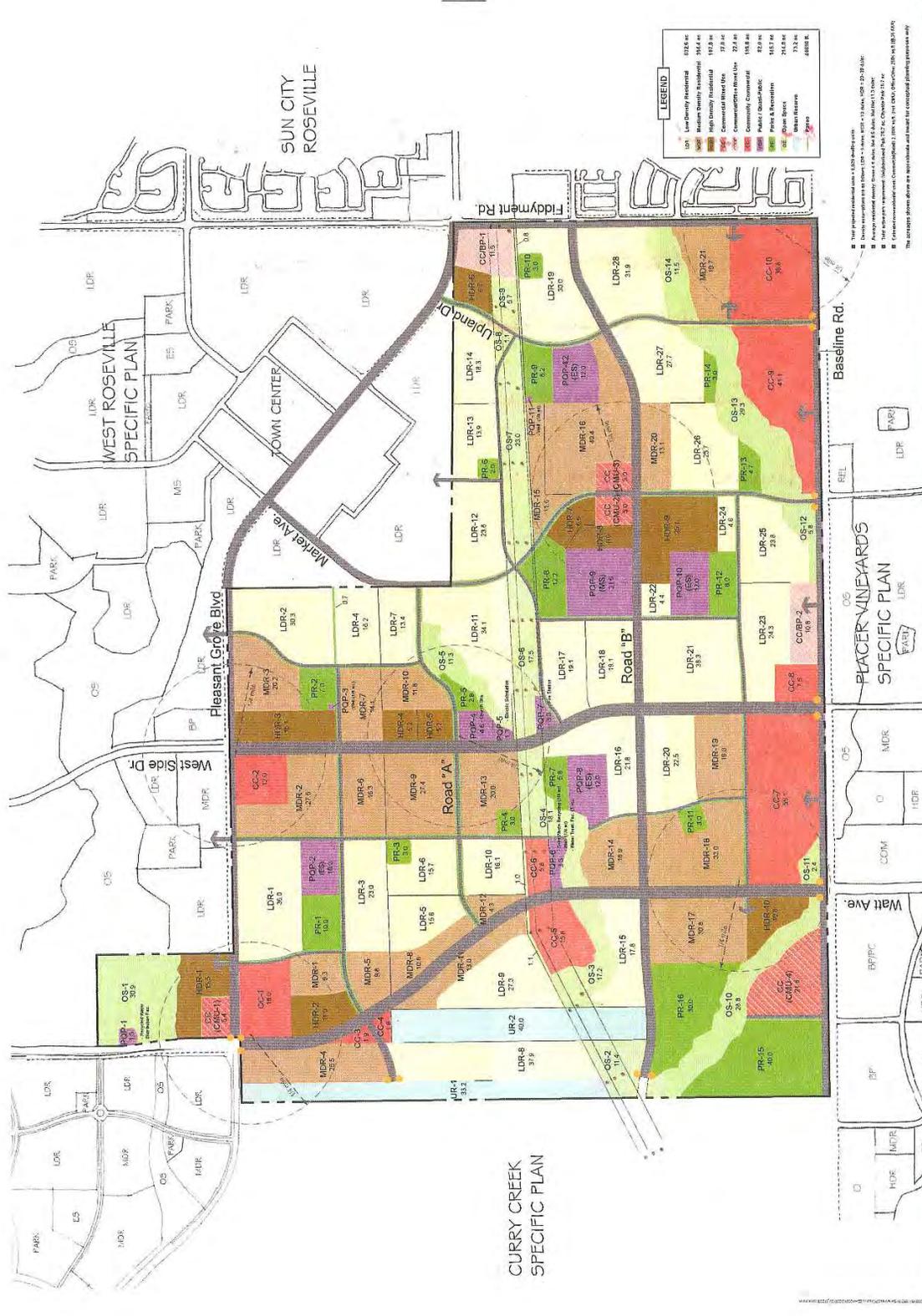
↑ K-5
Cont.

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

Sincerely,



Mark Morse
Environmental Coordinator



Conceptual Land Use Plan

1 RESPONSE TO COMMENT SET K

2 **K-1** The Revised Final EIR provides an analysis that has been clarified to
3 account for individual risks to the public due to the potential for fires and explosions,
4 which may result from pipeline releases. The Revised Final EIR provides an analysis
5 that has been clarified to account for individual risks to the public if a pipeline release
6 were to occur with a subsequent fire or explosion. The risk assessment included
7 risk measurement terminology that was not defined in earlier versions of the
8 document, which has resulted in some confusion. A revised System Safety and Risk
9 of Upset report was completed by EDM Services, Inc. for the proposed Project, and
10 is included as Appendix H-3 of this Revised Final EIR.

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

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

25 ~~The Draft EIR provides an analysis of the risks associated with current and planned~~
26 ~~land uses in the area of the proposed pipeline. A System Safety and Risk of Upset~~
27 ~~report was completed by EDM Services, Inc. for the proposed Project, and is~~
28 ~~included as a part of Appendix H of the Draft EIR. A detailed discussion of the risks~~
29 ~~can be found in Sections 4.7, Hazards and Hazardous Materials, and 4.9, Land Use,~~
30 ~~of the Draft EIR.~~

31 ~~Natural gas could be released from a leak or rupture. If the natural gas reached a~~
32 ~~combustible mixture and an ignition source was present, a fire and/or explosion~~
33 ~~could occur. The Specific Plan areas (including the proposed SVSP) will be~~
34 ~~considered Class 3 areas per 49 CFR 192.5 once they are developed, and are~~
35 ~~shown as such on Figure 2-7 of the Draft EIR.~~

1 PG&E has proposed as a part of their Project to install the pipeline to meet or
2 exceed the current pipeline regulations (49 CFR 192) (refer to pages 4.7-36 and 4.7-
3 37 of the Draft EIR, as revised in Section 4.0 of this Revised Final EIR). The
4 proposed pipeline's exceedance of the regulations is summarized as follows:

- 5 • PG&E intends to install minimum 0.375-inch wall thickness pipe on the 30-
6 inch diameter segments. A large proportion of the proposed pipeline would
7 consist of 0.375-inch-wall thickness steel pipe (Grade X-65) designed for a
8 Maximum Allowable Operating Pressure (MAOP) of 975 pounds per square
9 inch gauge (psig). For Class 1 areas, the minimum regulated pipe wall
10 thickness is 0.3125-inch; a 0.375-inch wall thickness is proposed, 20 percent
11 greater than the minimum required. For Class 2 areas, the minimum
12 regulated pipe wall thickness is 0.375-inch; a 0.406-inch wall thickness is
13 proposed, 8 percent greater than the minimum required. For Class 3 areas,
14 the minimum regulated wall thickness is 0.4875-inch; a 0.500-inch wall
15 thickness is proposed, 3 percent greater than the minimum required. For
16 Class 1 areas, the minimum regulated pipe wall thickness is 0.3125-inch;
17 0.375-inch wall thickness is proposed, 20 percent greater than the minimum
18 required. For Class 2 areas, the minimum regulated pipe wall thickness is
19 0.375-inch; 0.406-inch wall thickness is proposed, 8 percent greater than the
20 minimum required. For Class 3 areas, the minimum regulated wall thickness
21 is 0.4875-inch; 0.500-inch wall thickness is proposed, 3 percent greater than
22 the minimum required. The additional wall thickness will provide added
23 strength.
- 24 • The minimum regulated cover for transmission pipelines is 3 feet in Class 2, 3,
25 and 4 areas. The Project as proposed would include 5 feet of cover in all class
26 areas. This would provide increased protection from third party damage.
- 27 • PG&E proposes to "butt-weld" all pipeline sections (pipes are welded together
28 without the ends overlapping). The project as proposed would include
29 radiographic inspection of all circumferential welds. The minimum regulations
30 (49 CFR 192.243) require only 10 percent, 15 percent and 100 percent
31 nondestructive testing of welds in Class 1, Class 2, and Class 3 / 4 areas
32 respectively. This additional testing will help to ensure structural integrity.
33 Welds that do not meet American Petroleum Institute 1104 specifications would
34 be repaired or removed. Once the welds are approved, the welded joints
35 would be covered with a protective coating and the entire pipeline would be
36 electronically and visually inspected for any faults, scratches, or other damage

1 ~~prior to installation of the pipeline. The Project as proposed would include full~~
 2 ~~penetration circumferential welds of all pipe joints, radiographic inspection of all~~
 3 ~~circumferential welds, and external coating of all weld joint areas to protect the~~
 4 ~~pipe joint areas from external corrosion. The minimum regulations (49 CFR~~
 5 ~~192.243) require only 10 percent, 15 percent and 100 percent nondestructive~~
 6 ~~testing of welds in Class 1, Class 2, and Class 3 / 4 areas respectively. This~~
 7 ~~additional testing will help to ensure structural integrity.~~

- 8 • The Project as proposed would include inspections and testing for cathodic
 9 protection, valve testing, pipeline patrols, and leak surveys on a regular basis.
 10 High Consequence Area (HCA) risk assessment would be completed every
 11 seven years.

- 12 • A Pipeline Integrity Management Plan must be prepared for pipe within HCAs.
 13 This program must comply with 49 CFR 192 Subpart O.

14 The required DOT regulations, along with PG&E Project features that meet and
 15 exceed the minimum requirements, would reduce risks of project upset. Even
 16 though the project risk impacts are less than significant, additional measures shall
 17 be implemented to further reduce risks of project upset. MM HAZ-2a and MM HAZ-
 18 2b have been revised. Refer to Section 4.0 of this Revised Final EIR for revisions to
 19 the Draft EIR.

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

28 ~~Measures have been implemented to reduce the risks of explosion, torch fires, and~~
 29 ~~flash fires. However, the lead agency recognizes that the risks remain significant~~
 30 ~~and unavoidable even after mitigation. The CSLC will need to balance the~~
 31 ~~economic, legal, social, technological, or other benefits of the proposed Project~~
 32 ~~against its unavoidable environmental risks when determining whether to approve~~
 33 ~~the Project. If the EIR is certified by the CSLC, a statement of overriding~~

1 ~~considerations will need to be adopted at the time of certification and approval of the~~
2 ~~Project (CEQA Guidelines Section 15093).~~

3 **K-2** The following discussion is in response to the bulleted list included in the
4 comment letter:

5 **Response to Comment K-2, Bullet 1** PG&E indicated they have been working
6 with the SVSP civil engineering firm of MacKay and Soms to coordinate the
7 pipeline vertical and horizontal alignment with the future road alignments dictated by
8 the City of Roseville. PG&E has used the best design information available in
9 locating the pipeline. Currently the road improvement plans are limited to line work
10 in plan view only. The Baseline Road design has not progressed to include future
11 elevations, drainages or utility infrastructure. PG&E has designed the line with 8 feet
12 of cover in known intersections. The proposed 5 feet of cover is generally adequate
13 for driveway crossings. In the absence of final road improvement design drawings,
14 PG&E has increased cover at major road crossing to 8 feet. It is PG&E's experience
15 that 8 feet of cover will generally allow for typical road construction and utility
16 crossings. PG&E would like to work with SVSP to coordinate design of underground
17 utilities so that potential conflicts can be addressed prior to construction of the
18 pipeline.

19 The commenter has indicated that the proposed pipeline should be buried with a
20 cover of 15 feet to avoid conflicts with other utilities. A mitigation measure (MM LU-
21 1d) has been added to section 4.9, Land Use and Planning, to address potential
22 conflicts with utilities. Refer to Section 4.0 of this Revised Final EIR for revisions to
23 the Draft EIR.

24 **Response to Comment K-2, Bullet 2** The industry best practice is to install
25 transmission pressure pipelines in a private easement whenever possible. PG&E
26 does have transmission pipelines under paved road surfaces in Roseville, but those
27 lines were installed post road improvements when no suitable location existed
28 beyond the paved surface.

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

1 **Response to Comment K-2, Bullet 3** As noted above in response to Bullet 2,
2 PG&E has utilized the best available information regarding the Baseline Road
3 alignment. PG&E will adjust the pipeline alignment if feasible once the road design
4 is finalized.

5 PG&E has located the 50-foot easement at the future Baseline Road back of curb
6 per plans provided by the design firm of MacKay and Soms. This easement is
7 planned to be contiguous with the proposed landscape strip.

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

14 **K-3** PG&E has indicated they advised City of Roseville representatives that
15 the station location has some flexibility; however, the existence of sensitive
16 resources, and operational constraints, will limit potential locations. PG&E
17 representatives are available to work with both the City and the CSLC on this issue.

18 **K-4** PG&E has indicated they advised City of Roseville representatives that
19 these underground valves are existing equipment installed during a previous project
20 and have discussed with the City allowable and compatible uses over and near
21 these existing valves. PG&E representatives are available to work with the City on
22 this issue.

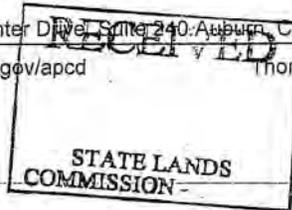
23 **K-5** The aesthetic impacts of the proposed Project are discussed in Section
24 4.1, Aesthetic and Visual Resources, of the Draft EIR. Furthermore, PG&E has
25 indicated they met with City of Roseville representatives and has agreed to work
26 with the City to enclose the proposed Baseline Road station in a manner, and using
27 materials, compatible with the planned development and acceptable to both parties.

28

29



3091 County Center Drive, Suite 240, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373
www.placer.ca.gov/apcd Thomas J. Christofk, Air Pollution Control Officer



June 10, 2009

Crystal Spurr, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
Via email to spurr@slc.ca.gov on June 12, 2009

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

Dear Mrs. Spurr:

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

L-1

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

L-2

The proposed project has the potential to result in significant air quality impacts from construction equipment and activity. The California Environmental Quality Act (CEQA) Guidelines Section 15021 establishes a "duty for public agencies to avoid or minimize environmental damage where feasible." Therefore, an air analysis should be provided in environmental review process to quantify the project's short-term construction emissions and compared them to the air district's significant thresholds. If necessary, feasible mitigation measures should be identified and implemented by the project to prevent significant impacts. SMAQMD Road Construction 6.3.1 model is an acceptable planning tool recognized by the PCAPCD and SMAQMD to estimate roadway construction emissions.

L-3

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

L-4

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

proposed project.

ap1 1a. The applicant shall submit a Construction Emission / Dust Control Plan to the Placer County APCD. This plan must address the minimum Administrative Requirements found in section 300 and 400 of APCD Rule 228, Fugitive Dust. The applicant shall not break ground prior to receiving APCD approval of the Construction Emission / Dust Control Plan.

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

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

Ap2 The contractor shall suspend all grading operations when fugitive dust exceeds Placer County APCD Rule 228 (Fugitive Dust) limitations. The prime contractor shall be responsible for having an individual who is CARB-certified to perform Visible Emissions Evaluations (VEE). This individual shall evaluate compliance with Rule 228 on a weekly basis. It is to be noted that fugitive dust is not to exceed 40% opacity and not go beyond property boundary at any time. If lime or other drying agents are utilized to dry out wet grading areas they shall be controlled as to not to exceed Placer County APCD Rule 228 Fugitive Dust limitations.

L-4
Cont.

Ap3 An enforcement plan shall be established, and submitted to the APCD for review, in order to weekly evaluate project-related on-and-off- road heavy-duty vehicle engine emission opacities, using standards as defined in California Code of Regulations, Title 13, Sections 2180 - 2194. An Environmental Coordinator, hired by the prime contractor or property owner, and who is CARB-certified to perform Visible Emissions Evaluations (VEE), shall routinely evaluate project related off-road and heavy duty on-road equipment emissions for compliance with this requirement. Operators of vehicles and equipment found to exceed opacity limits will be notified by APCD and the equipment must be repaired within 72 hours.

Ap4 The prime contractor shall suspend all grading operations when wind speeds (including instantaneous gusts) exceed 25 miles per hour and dust is impacting adjacent properties.

Ap5 The contractor shall use CARB ultra low diesel fuel for all diesel-powered equipment. In addition, low sulfur fuel shall be utilized for all stationary equipment.

Ap6 Pursuant to the Placer County Air Pollution Control District Rule 501, General Permit Requirements, the proposed project may need a permit from the District prior to construction. In general, any engine greater than 50 brake horsepower or any boiler with heat greater than 1,000,000 Btu per hour will need a permit issued by the District.

L-5

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

Sincerely,

Angel Rinker

Angel Rinker
Placer County Air Pollution Control District
Associate Planner
Arinker@placer.ca.gov
(530) 745-2333

1 RESPONSE TO COMMENT SET L

2 **L-1** The commenter provided some introductory remarks to preface the
3 comment letter, as well as state designations for ozone and particulate matter.
4 Table 4.3-1 on page 4.3-5 of the Draft EIR shows Placer County as nonattainment
5 for ozone and particulate matter.

6 **L-2** The Placer County Air Pollution Control District (PCAPCD) and
7 Sacramento Metropolitan Air Quality Management District (SMAQMD) jurisdictions
8 and thresholds are discussed on page 4.3-37 and 4.3-38 of the Draft EIR, in Section
9 4.3, Air Quality. As shown in Table 4.3-4, PCAPCD has the more stringent
10 thresholds. As such, the PCAPCD's thresholds were applied to construction activity
11 that would occur within Placer County, consistent with the PCAPCD's
12 recommendation.

13 **L-3** An air quality analysis was completed for the Project, the results of which
14 were summarized in Section 4.3, Air Quality, of the Draft EIR. Please refer to
15 Section 4.0 of this document for revisions to the Draft EIR, as well as the revised Air
16 Quality Data and Methodology that are included in Appendix D-8 of this Revised
17 Final EIR. Because of the type of information available, and the complexity of
18 conducting an air quality analysis for a Project consisting of multiple pipelines and
19 spanning multiple air districts, the CSLC determined that the most appropriate
20 approach to completing the analysis would be to utilize a combination of hand-
21 calculations using the OFFROAD emission factors and the URBEMIS default load
22 factors for each equipment piece, and the URBEMIS model for the on-road hauling,
23 dust generation, and operational emissions. Because a Project-specific construction
24 fleet is not known for the Dunnigan Hills portion of Line 406, the URBEMIS default
25 assumptions and values were used for these emissions estimates.

26 **L-4** Pages ES-15, 4.3-47, 4.3-48, 4.3-63, 4.3-65, 4.3-67, 4.3-69, and 4.3-73
27 (Table 4.3-35) of the Draft EIR have been revised to include the suggested
28 mitigation measure for construction work completed within the jurisdiction of the
29 PCAPCD. Refer to Section 4.0 of this Revised Final EIR for revisions to the Draft
30 EIR. MM AQ-1c is included in the revised Mitigation Monitoring Program provided
31 as ~~Appendix F to~~ in this Revised Final EIR.

32 **L-5** The commenter advised of PCAPCD's Rule 501 requirements, which
33 requires a PCAPCD permit prior to construction and installation of stationary sources
34 including any engine greater than 50 brake horsepower or any boiler with heat
35 greater than 1,000,000 Btu per hour. CSLC acknowledges that a permit may be

1 required. The PCAPCD is listed in Section 1.4, Permits, Approvals, and Regulatory
2 Requirements, on page 1-9 of the Draft EIR.

3

4

June 12, 2009

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

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

Dear Ms. Spurr,

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

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

M-1

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

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

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

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

and/or:

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

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



M-1
Cont.

M-2

M-3

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

↑
M-3
Cont.

- On page 7 of the MMP, specifically list the AQ-1b NO_x mitigation measures listed on page 4.3-47.

M-4

- PuriNOx fuel is no longer available in the Sacramento Region. Please remove it as a mitigation option.

M-5

- SMAQMD applauds the proponent for the applicant proposed measures starting on page 4.3-39. However, APM AQ-11 on page 4.3-40 which states that "Contractors will limit operation on "spare the air" days within each County" while laudable, may be difficult to implement effectively, since there are no goals or standards for limiting operation. Please either elaborate on how operations will be limited or remove the mitigation measure.

M-6

- The document provides the results of an analysis of the construction-related CO₂E emissions in Table 4.3-12. For the DFM line which is in the SMAQMD's jurisdiction, the reported emissions are 181.30 MT CO₂E in 2010. In total, including the impacts created in other air districts, the project will generate 2,681.94 MT CO₂E over 4 years. The document seeks to reduce this impact to zero through the purchase of carbon offsets in Mitigation Measure 3. MMAQ3 currently reads "The applicant shall participate in a Carbon Offsets Program with CCAR, CARB or one of the local air districts, and will purchase carbon offsets equivalent to the projected project's GHG emissions to achieve a net zero increase in GHG emission during construction phase."

M-7

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

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

↓
M-8

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

↑
M-8
Cont.

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

M-9

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

Sincerely,



Paul Philley
Assistant Air Quality Planner / Analyst

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

Attachments:

- 1) SMAQMD Rules & Regulations Statement

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

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

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

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

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

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

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

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

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

1 RESPONSE TO COMMENT SET M

2 **M-1** Comment acknowledged. Pages ES-15, 4.3-47, 4.3-48, 4.3-62, and 4.3-
3 73 (Table 4.3-35) of the Draft EIR have been revised to include the suggested
4 mitigation measure for construction work completed within the jurisdiction of the
5 SMAQMD. Refer to Section 4.0 of this Revised Final EIR for revisions to the Draft
6 EIR. MM AQ-1d is included in the revised Mitigation Monitoring Program, ~~Appendix~~
7 ~~F to~~ in this Final EIR.

8 **M-2** The maximum daily emissions were not calculated based on location of
9 construction activities, but rather based on what the "worst-case" day of construction
10 would be for each pipeline (Line 406, Line 407 W, Line 407 E, and the DFM). For
11 the construction of the DFM, maximum daily emissions shown in Draft EIR Table
12 4.3-7 would have the potential to occur along the entire length of the pipeline,
13 including the portion of the Project within the SMAQMD (refer to page 4.3-44 of the
14 Draft EIR). As shown in Table 4.3-7, 348.10 pounds per day is the maximum daily
15 NO_x emissions that would be expected to occur within the SMAQMD.

16 **M-3** The Draft EIR air quality analysis is based on the information available at
17 the time of the analysis. There is an inherent uncertainty in the analysis that makes
18 calculating the required mitigation fees too speculative and inaccurate to be provided
19 at this time. For example, the construction equipment engine years are currently
20 unknown; therefore, the off-road emission factors used for emissions calculations
21 are statewide averages. Further, the amount of Project emission reductions
22 achievable through implementation of the APMs and mitigation measure cannot be
23 calculated at this time because the specifics of the project equipment will be
24 unknown until a contractor has been hired for project construction. The mitigation
25 fee component of MM-AQ-1b will be calculated closer to the time of construction to
26 ensure that the calculation is as accurate as possible.

27 **M-4** MM AQ-1b and the listed NO_x mitigation measure options are included in
28 the revised Mitigation Monitoring Program, ~~Appendix F to~~ in this Final EIR. Refer to
29 Section 4.0 of this Revised Final EIR for revisions to page 4.3-47 of the Draft EIR.

30 **M-5** The reference to PuriNO_x fuel in MM AQ-1b has been removed and page
31 4.3-47 of the Draft EIR has been revised. Refer to Section 4.0 of this Revised Final
32 EIR for revisions to the Draft EIR. MM AQ-1b is included in the revised Mitigation
33 Monitoring Program, ~~Appendix F to~~ in this Final EIR.

1 **M-6** PG&E considers “Spare the Air” days as air quality constraints and will
2 alert crews when a Spare the Air day is expected to occur. This will encourage
3 carpooling and reinforce the need to avoid unnecessary running of equipment. On
4 Spare the Air days, inspectors will identify equipment use that is not critical to the
5 progress of the Project. APM AQ-11 (Page 4.3-40) of the Draft EIR has been
6 updated to reflect measures taken on Spare the Air days. Please refer to Section
7 4.0 of the Revised Final EIR for revisions to the Draft EIR.

8 **M-7** Page 4.3-52 of the Draft EIR has been revised to modify MM AQ-3 to
9 allow PG&E to purchase carbon offsets through existing carbon markets, and a
10 timeline for compliance has been added. Refer to Section 4.0 of this Revised Final
11 EIR for revisions to the Draft EIR. MM AQ-3 is included in the revised Mitigation
12 Monitoring Program, ~~Appendix F to~~ in this Revised Final EIR.

13 **M-8** Please refer to response to comment M-7.

14 **M-9** Comment acknowledged. Pages 4.3-25 through 4.3-29 of the Draft EIR
15 included SMAQMD rules applicable at the time of the publication of the document.

16



Serving Sutter and Yuba Counties

938 14th Street
Marysville, CA 95901
(530) 634-7659
FAX (530) 634-7660
www.fraqmd.org

David A. Valler, Jr.
Air Pollution Control Officer

Comment Set N
Page 1 of 1

June 12, 2009

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

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

Dear Ms. Spurr,

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

N-1

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

N-2

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

Sincerely,

Sondra Andersson
Air Quality Planner

Enclosures: None

File: Chron

1 **RESPONSE TO COMMENT SET N**

2 **N-1** Comment acknowledged. The commenter commends the Draft EIR,
3 Section 4.3, Air Quality, for the commitment to mitigate air quality impacts to less
4 than significant using both onsite and off-site mitigation. The commenter advised
5 that the Feather River Air Quality Management District (FRAQMD) will provide
6 assistance for the implementation of the mitigation. No further response is
7 necessary.

8 **N-2** The maximum daily emissions was not calculated based on location of
9 construction activities, but rather based on what the “worst-case” day of construction
10 would be for each pipeline (Line 406, Line 407 W, Line 407 E, and the DFM). For
11 the construction of portions of the pipeline in Sutter County, maximum daily
12 emissions shown in Table 4.3-9 would have the potential to occur (refer to page 4.3-
13 45 of the Draft EIR). As shown in Table 4.3-9, up to 707.96 pounds per day of NO_x
14 emissions, 69.23 pounds per day of ROG, 201.76 pounds per day of CO, 159.06
15 pounds per day of PM₁₀, and 28.81 pounds per day of PM_{2.5} emissions would be
16 expected to occur during construction of the Project within the jurisdiction of the
17 FRAQMD.

18

19



June 12, 2009

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

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

Dear Ms. Spurr,

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

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

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

O-1
↓ O-2

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

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

O-11

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

O-12

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

O-13

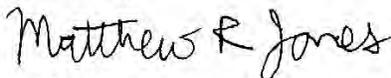
Additionally, the District was unable to locate any other off-road equipment used for construction of the 407W section other than the water truck. This is a discrepancy when compared to the off-road equipment selected for the 406 and 407E sections. Moreover, cut and fill activities are indicated yet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

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

O-14

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

Sincerely,



Matt Jones
Supervising Air Quality Planner

1 RESPONSE TO COMMENT SET O

2 **O-1** Please refer to response to comment M-6.

3 **O-2** Pages 4.3-5, 4.3-6, and 4.3-26 of the Draft EIR have been revised to
4 reflect the current PM_{2.5} attainment status of Yolo, Sutter, Sacramento, and Placer
5 counties. Refer to Section 4.0 of this Revised Final EIR for revisions to the Draft
6 EIR.

7 **O-3** Please refer to response to comment O-2.

8 **O-4** Page 4.3-26 of the Draft EIR has been revised to reflect the most recent
9 information regarding the status of the Sacramento Regional 8-hour Ozone
10 Attainment and Reasonable Further Progress Plan. Refer to Section 4.0 of this
11 Revised Final EIR for revisions to the Draft EIR.

12 **O-5** Please refer to response to comment O-2.

13 **O-6** Page 4.3-37, Table 4.3-4 of the Draft EIR has been revised to reflect the
14 current Reactive Organic Gases (ROG), oxides of nitrogen (NO_x) and Particulate
15 matter (PM₁₀) thresholds of the Yolo-Solano Air Quality Management District
16 (YSAQ).

17 **O-7** Comment acknowledged. The CSLC agrees with the commentor that the
18 vehicle idling time of five minutes is a state requirement and not a mitigation
19 measure. Since the CLSC will hire a third-party monitor for construction of the
20 project to ensure all APMs and mitigation measures are implemented, we would like
21 to keep the 5-minute idling limit as a part of APM AQ-5 to ensure it is monitored.
22 ~~considers APMs to be components of the proposed Project. Where necessary to~~
23 ~~reduce impacts to less than significant levels, additional mitigation measures are~~
24 ~~proposed in the Draft EIR.~~

25 **O-8** The Draft EIR has been revised to reflect annual (total tons) of ROG and
26 NO_x emissions for the portion of the Project that would be located in Yolo County
27 and includes the correct thresholds of significance for the YSAQMD. The revision to
28 the NO_x significance threshold reduced NO_x to less than significant before mitigation.
29 However, the revision to the PM₁₀ significance threshold resulted in a change in
30 PM₁₀ to significant before mitigation. Implementation of existing MM AQ-1a would
31 reduce the PM₁₀ impact to less than significant. Page 4.3-38 has been revised to
32 reflect the correct emission calculation methodology. Table 4.3-5 on page 4.3-43,

1 Table 4.3-8 on page 4.3-44, page 4.3-45, Table 4.3-11 on page 4.3-46, Table 4.3-14
2 on page 4.3-53, page 4.3-54, Table 4.3-16 on page 4.3-55, Table 4.3-18 on page
3 4.3-56, Table 4.3-20 on page 4.3-58, page 4.3-59, Table 4.3-22 on page 4.3-60 and
4 page 4.3-61 of the Draft EIR have been revised. Page 4.3-47 of the Draft EIR has
5 also been revised to reflect the mitigated Line 406 PM₁₀ emissions. Refer to Section
6 4.0 of this Revised Final EIR for revisions to the Draft EIR.

7 In addition, the air quality analysis appendix has been amended to include Appendix
8 D-8, Yolo County Line 407 W Emissions, Appendix D-9, Line 406 Mitigated, and
9 Appendix D-10, Alternatives Emissions Analysis - Yolo County. Revised Air Quality
10 Data are included in Appendix D-8 of this Revised.

11 **O-9** The acronym listed for YSAQMD in the Mitigation Monitoring Program has
12 been revised, ~~refer to Appendix F of~~ in this Revised Final EIR.

13 **O-10** Please refer to response to comment O-8.

14 **O-11** Please refer to response to comment O-8. The air emissions generated
15 by the Dunnigan Hills grading portion of the proposed Project is provided in
16 Appendix D-8 of this Revised Final EIR: URBEMIS Output, Line 406 file, Mass
17 Grading Phase 5/04/2009 to 5/22/2009 - Dunnigan Hills.

18 **O-12** Please refer to response to comment O-8.

19 **O-13** The commenter is referring to the URBEMIS output that reads, “Fugitive
20 Dust Level of Detail: Low”. The selection does not equate to a low level of fugitive
21 dust emissions, but the level of input detail required for calculation. Within the
22 construction module of the URBEMIS program, the modeler can select the following
23 levels of detail dependent upon the type of project-specific information available:
24 default, low, medium, and high. The purpose of the levels of detail is to customize
25 the emission calculations with known project parameters.

26 The default level calculates fugitive dust emissions with a simple pounds per acre-
27 day emission rate. The low level calculates fugitive dust emission based on the
28 cubic yards of soil to be moved onsite and off-site. The medium level can be used if
29 the daily hours of operation per day and the hours per day of off-site haulage are
30 known. The high level of detail calculates fugitive dust based on the ton-miles per
31 day of on-site and off-site soil haulage.