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CALIFORNIA STATE  
LANDS COMMISSION  
MAY 23 2009  
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.
2. Construction is a very destructive process to fertile ag land. Water percolates into ground water. Construction could intersect this process and effect ground table water.
3. Yolo County has had an objective to promote farming. Their detailed objectives can be reviewed by going online to [www.yolocounty.org](http://www.yolocounty.org). Under County Administrator, General Plan Update their vision statement is outlined. A pipeline would prohibit future deep rooted farming practices (e.g., walnut, almond, fruit trees & grape vines) over the proposed line. This has the affect of not only reducing farm income but includes associated ag related jobs & related economic infrastructure. An attachment dated July 22, 2003 to Judy Brown , California State Lands Commission has comments regarding the Draft EIR for Kinder Morgan Concord to West Sacramento Pipeline Project (State Clearing house Number 2002022019 EIR 711) from Lynnel Pollock, Chair Yolo County

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

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

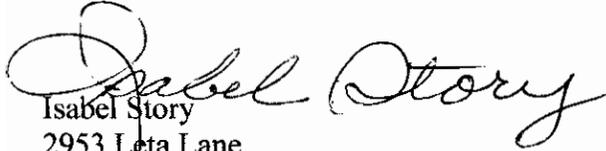
5. Homes built have had increased square footage (aka McMansions). Now interest is to downsize homes which not only saves land but consumption of natural resources as well. Downtown Sacramento has increased its population with lofts & condos. For years the City of Davis has been trying to have a slow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

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Isabel Story". The signature is written in black ink and is positioned above the typed name and address.

Isabel Story

2953 Leta Lane

Sacramento, CA 95821

Phone number: 916.489.4709

Email address: [imstory47@gmail.com](mailto:imstory47@gmail.com)

May 27, 2009

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

ATTACHMENT "A"

## DRAFT

July 22, 2003

California State Lands Commission

Attn: Judy Brown

100 Howe Avenue, Suite 100-South

Sacramento, CA 95825-8202

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

Pipeline Project (State Clearinghouse Number 2002022010 EIR 711).

Dear Ms. Brown,

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

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

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

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

new information and/or analysis become available.

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

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

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

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

integrity or maintenance.

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

should be avoided during harvest season.

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

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

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

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

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

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

impacts to agricultural operations and terrestrial wildlife.

*attachment*

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

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

4

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

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

staging areas for greater than thirty days.

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

Department prior to the commencement of construction.

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

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

City-County Pass-Through Agreement.

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

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

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

document is appreciated.

Sincerely,

Lynnel Pollock, Chair

Yolo County Board of Supervisors



# Enterprise Rancheria

Estom Yumeka Maidu Tribe

Ph: (530) 532-9214

Fax: (530) 532-1768

Email: [info@enterpriserancheria.org](mailto:info@enterpriserancheria.org)

3690 Olive Hwy  
Oroville, CA. 95966 -5723

May 28, 2009

Crystal Spurr  
Project Manager

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

Sutter, County

Enterprise Rancheria EPA Department

**The tribes offer site monitors to assist on these projects.**

**We need a map of the Sutter area that will be affected !**

Our protocol is as follows.

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

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

The tribe will work with local authorities on the disposition of cultural resources.

We will be working with the tribes in our area and you on this project!

EPA Planner

Site Monitor

Ren Reynolds



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

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

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

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

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

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

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

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

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

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

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

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

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

William Dibble  
Barbara Dibble  
Dorothy Dibble



MIWOK  
MAIDU

United Auburn Indian Community  
of the Auburn Rancheria

JESSICA TAVARES  
CHAIRPERSON

JOHN SUEHEAD  
VICE CHAIR

DAVID KEYSER  
SECRETARY

DOLLY SUEHEAD  
TREASURER

GENE WHITEHOUSE  
COUNCIL MEMBER

May 27, 2009

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

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

Dear Ms. Spurr,

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

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

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

Sincerely,

Greg Baker  
Tribal Administrator

CC: Shelley McGinnis, AES

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May 29, 2009

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

Dear California State Lands Commission,

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

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

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

Any question call us at 787-3384.

A handwritten signature in black ink that reads "Howard & Bonnie Lopez". The signature is written in a cursive, flowing style.

Howard and Bonnie Lopez



# Center Joint Unified School District

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

## BOARD OF TRUSTEES

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Donald E. Wilson

## SUPERINTENDENT

Dr. Kevin Jolly, Ed.D

June 9, 2009

VIA EMAIL to [spurrc@sic.ca.gov](mailto:spurrc@sic.ca.gov) and U.S. Mail

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

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

Dear Ms. Spurr:

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

### **OVERVIEW AND GENERAL COMMENTS**

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

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

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

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

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

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

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

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

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

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

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

#### **SPECIFIC COMMENTS**

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

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

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

Similarly the DEIR provides:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Caused a death or personal injury requiring hospitalization;

Resulted in gas ignition;

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

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

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

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

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

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

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

8. Hazardous Materials Release (DEIR 4.7)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**CONCLUSION**

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

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

Very truly yours,



Craig Deason  
Assistant Superintendent, Facilities  
and Operations

CD:cf

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

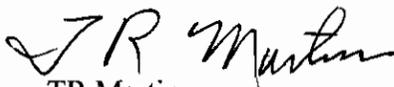
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530-795-2479-OFFICE  
530-627-5602-CELL

June 3, 2009

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

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

Sincerely,

  
TR Martin

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# County of Yolo

## BOARD OF SUPERVISORS

625 Court Street, Room 204  
Woodland, California 95695-1268  
(530) 666-8195 FAX (530) 666-8193  
www.yolocounty.org

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*Clerk of the Board* - Ana Morales

June 12, 2009

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

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

Dear Ms. Spurr,

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

### Project Description

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

### Agricultural Resources

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

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

### Biological Resources

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

### Land Use and Planning

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

### Transportation and Traffic

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

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

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

### Conclusion

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

Sincerely,



Mike McGowan, Chair  
Yolo County Board of Supervisors

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**Linda S. Adams**  
*Secretary for  
Environmental  
Protection*

# California Regional Water Quality Control Board Central Valley Region

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

---

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



**Arnold  
Schwarzenegger**  
*Governor*

9 June 2009

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

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

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

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

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

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

The new pipeline construction would include the following activities:

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

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***California Environmental Protection Agency***

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

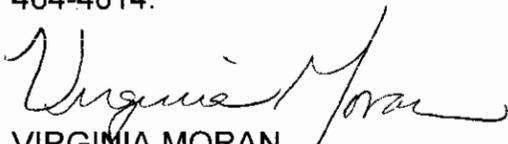
Since a specific preferred alternative was not identified in the DEIR, the Central Valley Regional Board is not providing specific project comments for the Draft EIR however; we have determined that this project has the potential to adversely affect water quality and waters of the U.S. and California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

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

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

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

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



VIRGINIA MORAN  
Environmental Scientist  
Water Quality Certification Unit

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

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**CENTRAL VALLEY FLOOD PROTECTION BOARD**

3310 El Camino Ave., Rm. LL40  
SACRAMENTO, CA 95821  
(916) 574-0609 FAX: (916) 574-0682  
PERMITS: (916) 574-0685 FAX: (916) 574-0682



June 10, 2009

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

Dear Ms. Spurr:

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

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

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

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

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

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

June 10, 2009  
Crystal Spurr  
Page 2 of 2

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

Sincerely,

A handwritten signature in cursive script that reads "James Herota".

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

cc:

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

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*OF COUNSEL*

June 12, 2009

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

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

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

Dear Ms. Spurr:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

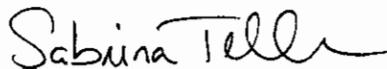
Crystal Spurr  
June 12, 2009  
Page 5 of 5

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

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

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

Sincerely,



Sabrina V. Teller



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June 12, 2009

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

*Via E-mail [spurrc@slc.ca.gov](mailto:spurrc@slc.ca.gov)  
and Regular Mail*

**Re: Pacific Gas & Electric Company (PG&E Line 406/407 Natural Gas Pipeline)  
Comments on Draft Environmental Impact Report**

Dear Ms. Spurr:

Our firm represents the Placer Vineyards Development Group, LLC (“Owners Group”), which processed and obtained approval of the Placer Vineyards Specific Plan in Placer County (the “Placer Vineyards Specific Plan”). As you know, at the beginning of this year we provided comments on behalf of the Owners Group with respect to the initial study for the above described Line 406/407 Natural Gas Pipeline (the “Project”), raising concerns about the adequacy of the alternatives and the compatibility of the Project with the Placer Vineyards Specific Plan. We note that, as part of the Alternatives analysis in the Draft Environmental Report (“DEIR”) for the Project, Options I, J, K and L, were included to avoid, or substantially lessen, the land use conflicts and risks to safety presented by locating the Project adjacent to the approved high school and within 1,500 feet of one of the approved elementary school sites in the Placer Vineyards Specific Plan.

On behalf of the Owners Group, we are writing this letter to (i) again question the adequacy of the range of alternatives considered in the Alternatives analysis and, (ii) if no other alternatives are determined to be feasible, to support your determination that the Environmentally Superior Alternative to the Project, other than the No Project Alternative, is the Project with the incorporation of Options I and L. We further contend that incorporating Options I and L into the proposed Project would result not only in an Environmentally Superior Alternative, but also in a Project Superior Alternative that will better advance the purposes of this Project, and that the Project description should be revised to incorporate these Options so the environmental effects thereof can be fully addressed by the DEIR.

**Additional Alternatives to be Considered.**

We note that the DEIR did not include any response to our prior comments regarding, or analysis of the potential feasibility of, modifying the Project to reduce the size and/or pressure of the line segments within Baseline Road adjacent to higher density urban developments. These additional alternatives should be addressed due to the potentially significant risk to health and safety caused by the Project as proposed, even with inclusion of all mitigation measures and mitigating Options. In Section 4.7 of the DEIR, the analysis of Impact HAZ-2 (starting on page 4.7-32), states that an unacceptable risk is defined as a one in a million chance of fatality from a natural gas leak or rupture. As noted in Table 4.7-5, the Project's overall risk of serious injury or fatality is estimated at approximately one in sixteen thousand (approximately 60 times greater than the accepted safety criteria); only the 10" DFM line reflects a safety risk that is less than the one in a million standard. And as noted on page 4.7-39, even after the proposed mitigation (to minimize corrosion and install shutdown valves) is incorporated into the Project, the residual risk of serious injury or fatality is only reduced to one in thirty thousand (approximately 33 times greater than accepted safety criteria). Given these significant risks to human health and safety, additional Alternatives that could reduce these potential impacts to acceptable levels must be seriously considered.

In particular, additional engineering alternatives may be available that could further reduce the risk of serious injury or fatality, such as thicker piping, or deeper installations, or protective outer casings with warning beacons to reduce the potential risk of damage or upset to the actual gas pipeline. These potential alternatives need to be considered, particularly near higher planned concentrations of people and activities, to effectively mitigate the potential impacts of this pipeline on the environment. While it may not be feasible to incorporate heightened design features for the full length of the pipeline, the increased benefit associated with incorporating additional safety features adjacent to higher density developments may justify the feasibility of these measures adjacent to the planned urban developments.

Similarly, pipeline designs should be considered that would allow the installation of smaller diameter pipelines within urban development areas. As noted in the DEIR, the 10" DFM pipeline is the only segment of the Project that is estimated to pose acceptable levels of risk of injury and fatalities. To avoid running a large, high pressure gas line adjacent to urban development that poses unacceptable and unmitigable levels of risk to safety, for the easternmost segment, a terminus for the high pressure portion of the Project located west of the Placer Vineyards Specific Plan should be considered, with smaller, low pressure pipelines installed from such terminus, through intervening developments, to the junction of Fiddymont and Baseline Roads. Such multiple lines could be installed as service lines throughout the area, as development occurs and service needs expand.