19 SEP 1998

BRUCE KANESHIRO, PROJECT MANAGER C/o ENVIRONMENTAL SCIENCE ASSOCIATES 225 BUSH STREET, SUITE 1700 SAN FRANCISCO, CA 94104

SUBJECT: PROPOSED DIVESTITURE OF ELECTRIC GENERATION ASSETS BY PACIFIC GAS AND ELECTRIC COMPANY, APPLICATION NO. 98-01-008

AFTER REVIEWING THE EIR REPORT AND ATTENDING THE CPUC PUBLIC MEETING ON COBB MOUNTAIN, CA., I HAVE SOME COMMENTS TO MAKE:

[Begin Y1]

1. THERE SEEMS TO BE ABSENCE OF ANY REVIEW OF THE IMPACT TO OPERATIONS WITH ALTERNATE FUELS, IE., NATURAL GAS, CRUDE OIL, PRICES. SOME OF THE FACILITIES ARE ALREADY SETUP FOR ALTERNATE FUELS. [End Y1]

[Begin Y2]

2. AS A GOOD DEAL OF THE TIME, THERE IS A TEMPERATURE INVERSION AT APPROX 3000 FT MSL, NOISE VALUES CAN CHANGE IN AMPTITUDE AND BE TRANSMITTED SOME DISTANCE. IN ADDITION, WHEN A CLOUD CONDITION ALSO IS AT THE APPROX SAME ELEVATION, NOISE OVER 50 Db CAN TRAVEL SOME DISTANCE. WHEN STACKING OCCURS, THIS NOISE CAN IMPACT MUCH OF THE COBB MTN AREA. IN THE PROPOSED EIR AND THE PUBLIC MEETING, NO MENTION WAS MADE ON THIS SUBJECT. [End Y2]

[Begin Y3]

3. VERY LITTLE WAS MADE OF THE 50+ WEEKLY SEISMIC ACTIONS WE HAVE HERE ON COBB MTN. THIS NEEDS TO BE ADDRESSED MORE. [End Y3]

[Begin Y4]

4. THE ONLY DISCUSSION I COULD FIND ABOUT REINJECTION PROGRAMS WAS THE PROPOSED TWO PROJECTS PLANNED BY SANTA ROSA, NOTHING ABOUT THE CURRENT LINE FROM THE CITY OF CLEARLAKE, CA. SEEMS IT COULD HAVE AN IMPACT. [End Y4]

[Begin Y5]

5. LASTLY, BUT NOT THE LEAST, IS THE SUBJECT OF BANKRUPTCY AND/OR ABANDONMENT OF POWER SITE AND THE RESTORING OF THE LAND TO THE ORIGINAL NATURAL CONFIGURATION, IE. PROFORMING BOND TO INSURE THE RESTORATION. MANY RESIDENCE HAVE HEARD RUMORS OF A SALE, AS BEING THE CHEAPEST WAY TO GET OUT WITHOUT THE COST OF RESTORATION, THEN BANKRUPTCY. WE WOULD LIKE TO SEE THIS SUBJECT COVERED IN DEPTH. [End Y5]

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT ME.

REGARDS,

E.J. (ERV) GALLAGHER, Fed P.E.

Y. ERV GALLAGHER, FED P.E.

(of Airspace Systems Aviation Consultants)

- Y1 It is assumed that the commenter's concerns are focused on the Geysers units. The Geysers units can operate only on geothermal steam. They cannot use any other alternate fuels such as natural gas or fuel oil. For the fossil-fueled steam turbines at Pittsburg, Contra Costa, and Potrero, it is foreseen that natural gas prices are likely to remain below comparable fuel oil prices in the future. In addition, Bay Area Air Quality Management District (BAAQMD) rules strictly limit fuel oil use in these units. The Potrero combustion turbines use distillate oil because natural gas use is not currently feasible.
- Y2 Because of new technology installed at the Geysers in recent years, stacking problems have largely been eliminated, and are not expected to increase as a result of the project. (Please see response to Comment H54 of the Lake County Air Quality Management District regarding steam stacking events at the Geysers Power Plant.) In addition, while it is true that temperature inversions and cloud conditions can affect the distance that noise travels, these conditions will persist no matter who owns the generating units. In other words, the project examined in this EIR (the sale of PG&E power plants) will have no effect on how often the noise events occur, or on the atmospheric conditions that affect how far the noise will travel.
- Y3 This issue is addressed in Section 4.3.2, beginning at the bottom of page 4.3-6 of the DEIR, and is further discussed in the responses to comments H11 and HH1.
- Y4 The current reinjection program is discussed in Impact 4.3-2, from page 4.3-12 to 4.3-14, and in Section 5.2.4 starting on page 5-9 of the DEIR.
- Y5 Please see response to Comment K1.