

## **INDIVIDUAL COMMENTS**



California Public Utilities Commission

October 13, 1999  
Lodi

Comments on the Draft EIR

NAME KEN Allen

ADDRESS: 3575 EMERSON Dr.  
Acampo Calif.  
95220

TELEPHONE (OPTIONAL): 209-368-9787

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:  
CA Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105  
Fax: 415-291-8943  
Email: cpuc-gas-lodi@pamsf.com

COMMENT: \_\_\_\_\_

I am concerned about operating a Compressor Station in our area.

1. there wasn't enough detail on how odors would be prevented from affecting the area. I suggest you visit the down wind side of McDonald Island and see what I mean.

II-1

2. How the noise levels of every day operation would be handled.

II-2

3. What are the Possibilities of polluting our Water Streets?

II-3

4. Who is going to benefit from this project? Who are they going to derive? If there are any savings it should go to our area as we are putting up with the project.

II-4

Please use the reverse side or attach any additional pages.

Sorry your team had to stand for the local concerns but the Owner sure didn't answer any questions.

QUESTIONS?

CONTACT THE INFORMATION LINE AT 415/989-1446, EXTENSION 85

CHECK OUT THE PROJECT WEBSITE [WWW.CPUC.CA.GOV/DMSIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM](http://WWW.CPUC.CA.GOV/DMSIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM)



## **Responses to Comments from Ken Allen**

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- I1-1. The comment concerns the potential for odors resulting from operation of the project. The potential for objectionable odors is analyzed in Section 3.5, “Air Quality”, of the draft EIR. The analysis found that although leaks in the piping components could result in the emission of small quantities of odorized gas, such leaks would be unlikely; however, this impact was determined to be significant. Mitigation Measure 3.5-4 which requires the Applicant to properly construct the piping components, to inspect the pipeline quarterly for leaks, and to repair leaks within 1 month following the quarterly inspection, would reduce this impact to a less-than-significant level. This mitigation measure has been revised to further ensure that potential odor impacts are minimized. See Chapter 3, “Revision to the Draft EIR”, in this final EIR. The potential for objectionable odors to result from operation of the compressor facility is discussed in Chapter 2, “Clarification of Major Issues”, of this final EIR.
- I1-2. The project Applicant has committed to compliance with the San Joaquin County Noise Ordinance, which requires that noise levels be no greater than 50 dBA during the daytime and 45 dBA at night at the nearest sensitive receptors measured as an hourly average (Leq). The noise impacts of the proposed project facilities are fully described in Section 3.10, “Air Quality”, of the draft EIR. The increase in noise levels would be almost imperceptible at the nearest residences to the project sites, and would not be perceived at residences farther from the project site. See Chapter 2, “Clarification of Major Issues”, of this final EIR for additional discussion of compressor noise.
- I1-3. Impact 3.4-3 on page 3.4-19 of the draft EIR identifies that there is potential for cross contamination of aquifers. The CPUC believes that developing or abandoning wells in compliance with the Department of Conservation’s Division of Oil, Gas, and Geothermal Resources rules and regulations reduces this potential impact to a less-than-significant level.
- I1-4. The commenters desire for local financial benefits from the project is noted. The proposed project, if approved, would provide a statewide benefit. Direct local reductions in the price of natural gas would not likely be a result of the project. The Applicant has stated that several hundreds of thousands of dollars per year would be brought to the local area through tax revenues from the project.

Letter I2

Sent By: LODI IRRIGATION;  
NOV 04 '99 11:41AM PUBLIC AFFAIRS MGMT

2093695110;

Nov-4-99 3:47PM;

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P.2/2



October 13, 1999  
Lodi

Regarding Lodi Gas Storage project

NAME: JOHN ARMANINO  
ADDRESS: 1165 N. BEECHER RD  
STKN, CAL  
95215  
TELEPHONE (OPTIONAL): (209) 931-3471

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:  
CA Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105  
Fax 415-281-8943  
Email: cpuc-gas-ldi@pam.sf.com

COMMENT: My family has owned the property downwind and across from P.G.E. gas storage on McDonald Island since 1950, prior to the storage project. Some days the odor from P.G.E. facility is so strong it causes nausea and headaches. When it happens daily we call and complain. Once after many days and our asparagus crew evacuated our bunkhouse because they thought the gas was leaking from the heater (the odor was that strong and our bunkhouse is at least 1/2 mile downwind) We called the San Joaquin Health Dept. The Health Dept called a meeting and my wife and I met with the Dept, P.G.E. officials and their lawyer. P.G.E. said they would control the leakage and for about 1 yr they did but as recent as 6 weeks ago the odor was awful strong. Some days odor lasts 1 to 2 hrs to 4 to six hrs.

12-1

There was one big explosion in 1973 or 1974

Please use the reverse side or attach any additional pages. over

When P.G.E. was cleaning an injection well a spark set off a fire that burned for 17 days. It sounded like a freight train and the men in our bunkhouse couldn't sleep. Flame shot way in the air, P.G.E. hired Red Adair from Texas to dynamite out the fire.

About 8 yrs ago a cleaning well explosion covered about 12-20 miles with an oily substance. The well foreman for P.G.E. denied anything happened. I called San Joaquin Ag Dept, deputy agent Jim Allen came out and took samples. Our asparagus was quarantined so we and our neighbor were not allowed to sell our produce. My wife called P.G.E. headquarters, they called back and took full responsibility, bought 3-4 days production and paid to have workers vehicles washed also those parked at Turner Cut resort.

About ~~8~~ 7 years ago, I believe a compressor exploded and a piece of metal as big as a car came across the river and landed in my neighbors field. Also lots of smaller pieces were scattered about. The explosion moved his workers house 4" off its foundation.

Also my father and another old time farmer downwind from the P.G.E. facility have always felt that the emissions from the gas storage led to the decline of the migratory bird flight pattern that had existed prior to this facility's existence.

John Armanino  
If I can help further call (209 931-3471)

## **Responses to Comments from John Armanino**

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- I2-1. The comment concerns the potential for odors resulting from operation of the project. The potential for objectionable odors is analyzed in Section 3.5, “Air Quality” of the draft EIR. The analysis found that although leaks in the piping components could result in the emission of small quantities of odorized gas, such leaks would be unlikely; however, this impact was determined to be significant. Mitigation Measure 3.5-4, which requires the Applicant to properly construct the piping components, to inspect the pipeline quarterly for leaks, and to repair leaks within 1 month following the quarterly inspection, would reduce this impact to a less-than-significant level. The potential for objectionable odors to result from operation of the compressor facility is discussed in Chapter 2, “Clarification of Major Issues”, of this final EIR.
- I2-2. Although problems or accidents at PG&E facilities may cause concern, they are not related to the operation of the proposed project. The project, if approved, will be built to the latest safety standards to minimize potential accidents. In addition, various safety programs have been incorporated into the project description to protect the health and safety of people and the environment (see Section 2.4.13 of the draft EIR). Each of these programs will be approved and enforced by the federal, state, or local agency with jurisdiction over the relevant issues. Although no project can be designed to guarantee accident-free operations, the safety programs required for the project are sufficient to ensure a high degree of safety.
- I2-3. Patterns of use by birds vary substantially from season to season and year to year. The immediate area of the Lodi gas field and compressor facility are not heavily used by migratory birds and therefore operation of the compressor facility would not result in any substantial effects on use patterns. However, the general project area has many migratory bird species present.

# Letter I3

October 26, 1999

Ms. Judith Ikle, Project Manager  
**State of California - Public Affairs Management**  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105

Re: Application 98-11-012

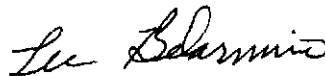
Dear Ms. Ikle:

The purpose of this letter is to voice my opposition to the Lodi Gas Storage Project. I own a small farm that will be affected by this project. I object to this project for the following reasons:

- The proposed Lodi Gas Storage project poses a dangerous threat to the Acampo area, specifically where my family lives. This danger has not been adequately addressed. I3-1
- This gas reservoir was abandoned because there was contamination involving the water aquifer. There have been no assurances that this will not happen again. I3-2
- The Lodi Gas Storage Company is local in name only. A Houston Corporation that is composed of private investors owns it. This corporation has never done a project like the one they are proposing. I3-3  
If this company goes bankrupt, who will cleanup the environment?
- This project appears to be on the fast track and there is a lot of momentum (money) to make this project happen quickly. I understand that your are now looking at the viability of three options. Why aren't you examining the option of doing nothing? I3-4

We, in the local community, are supposed to trust people that are only in it for the money, have no stake in the community, are doing something they have never done before, and we (the property owners) won't be able to hold them accountable if there is a major tragedy. ***I am very afraid for my family's safety if this project is approved.***

Thank you for the opportunity to comment on this proposal.



Lee Belarmino  
10387 E. Jahant  
Acampo, CA 95220

## **Responses to Comments from Lee Belarmino**

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- I3-1. The CPUC believes that the federal and state safety standards described in the draft EIR adequately protect the public and the environment.
- I3-2. The gas field was abandoned because it was not economical to remove any more gas. It is estimated that approximately 3 billion cubic feet of gas still exist in each gas reservoir (page 2-16 of the draft EIR). When the gas reservoir was nearly depleted, the existing wells also captured a large quantity of water that had to be re-injected. To remove additional gas without getting water, would have required drilling new wells. It was not economically feasible to drill new wells to recover the remaining gas.
- I3-3. Construction and operation of the project will primarily be monitored by local, state, and federal agencies which have jurisdictional authority over such facilities including, the U.S. Department of Transportation, Office of Pipeline Safety, and the California Division of Oil, Gas, and Geothermal Resources. These agencies are specifically designated as the primary agencies responsible for the appropriate and safe design of natural gas facilities, including providing for appropriate closure. Because of the nature of the project, it is not anticipated that substantial “cleanup” of the environment will be required.
- I3-4. The CPUC has made no decision regarding this project. The purpose of the draft EIR and final EIR is simply to identify and disclose potential environmental impacts to the public as part of the decision making process. In addition to looking at three action alternatives, the draft EIR examines the alternative of no project. This alternative is not extensively discussed in the draft EIR because the result of this alternative would simply be that the project would not be constructed and none of the impacts identified in the EIR would occur.



# Letter I4

To: **California Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, Ca. 94106**

Subject: **Lodi Gas Storage Draft EIR -- Comments and Recommendations**

From: **W. A. Bennett  
5081 E. Jahant Road  
Galt, Ca. 95632  
(209) 368-8494**

Date: **October 26, 1999**

Comments and recommendations related to the Lodi Gas Storage project and the draft EIR are made below. While I am opposed to this project, I believe that if the recommendations are implemented, the project would be much less objectionable and much more acceptable to its neighbors.

## NOISE:

The EIR noise discussions (and particularly the noise appendix) are obtuse and difficult to follow. Noise level units should be clearly defined and explained. Also, specific noise levels should be equated to every-day human noise experience so that the levels can be more easily understood. However, apart from the difficulty in understanding the EIR noise discussion, the following comments are made:

1. According to the EIR, Lodi Gas Storage is not subject to San Joaquin County noise regulations because it is regulated by the CPUC (page 3.10-3). If the CPUC is to regulate noise emanating from projects under its purview, the CPUC should have noise standards. However, CPUC noise standards are not included in the EIR and I suspect there are none. **IF THERE ARE NO CPUC NOISE STANDARDS, THE PROJECT SHOULD BE REQUIRED TO MEET (OR IMPROVE ON) SAN JOAQUIN COUNTY NOISE REQUIREMENTS.**
2. Even though it is not required, the EIR (page 2-45) says the separator and compressor facilities will meet the San Joaquin noise requirements. However, the noise levels on page 2-45 are higher than San Joaquin County allows. The following table summarizes the inconsistencies:

Noise Condition	Proposed Project as described in the EIR, page 2-45	San Joaquin County Noise Ordinance as described in the EIR page 3.10-3.
Noise -daytime.	55 dBA	50 dBA
Noise - nighttime	Not covered	45 dBA

For mitigation purposes, the San Joaquin County noise ordinance states that the noise levels mentioned above are to be measured at the plant boundary. LGS apparently does not intend to conform to that requirement since it talks about achieving noise levels at the nearest sensitive location. **SAN JOAQUIN COUNTY NOISE LEVEL REQUIREMENTS SHOULD BE ACHIEVED AT THE PLANT BOUNDARY.**

3. The unit of measure for noise is dBA (decibels above reference noise, A-weighted). The definition of dBA is not clear but in discussions with one of the CPUC's consultants, it appears that the dBA is a weighted average taken over a one-hour period. If this is true, that means there could be periods of several minutes throughout the day and night when the noise level is excessively high (such as might occur when pressure relief valves open or the plant vents). In other words, a 55 dBA noise level could be made up of approximately 55 minutes of 45 dBA noise and 5 minutes of 120 dBA noise. This is clearly unacceptable and also unnecessary.

In addition to maintaining the hourly weighted average dBA noise levels required by San Joaquin County, sound proofing should be installed to ensure that the maximum sound levels as indicated in the following table are not exceeded.

Duration of a Noise Event Within Any One-Hour Period (Minutes)	Daytime Noise Level (dBA)	Nighttime Noise Level (dBA)
30	50	45
15	55	50
5	60	55
1	65	60
0	70	65

**THE NOISE LEVELS INDICATED ABOVE ARE CONSISTENT WITH THE PREVIOUS SAN JOAQUIN COUNTY NOISE ORDINANCE AND SHOULD BE REQUIRED FOR THIS PROJECT.**

#### **AIR POLLUTION:**

If two of the primary air pollution components (NO<sub>x</sub> and ROG) produced by this project during the operations can not be reduced to acceptable standards by applying the best available control technology (BACT), the applicant plans to purchase *emission offsets* as a mitigation measure. This apparently means that the applicant can go to a different part of the San Joaquin Valley and buy credits from some other industrial facility which is not polluting up to the maximum. The applicant then uses the credits as offsets to its own pollution.

This means there can be pockets of severe air pollution interspersed within a relative clean area and as long as the average within the overall air pollution district meets the requirements, it is acceptable. This concept is ridiculous beyond words but is apparently the way the law is written.

The draft EIR states (page 3.5-14) that the San Joaquin Valley Air Pollution Control District or the applicant may elect to install electrically driven compressors which would essentially eliminate local emissions. Electrically driven compressors would also eliminate much of the noise problem.

**AS A CONDITION FOR APPROVING THIS PROJECT, THE CPUC SHOULD REQUIRE THE INSTALLATION OF ELECTRICALLY DRIVEN COMPRESSORS. THIS SHOULD NOT BE OPTIONAL.**

## PROPERTY VALUES

There will be a "market stigma" attached to properties near this pipeline and its stationary facilities. This means that such properties will not be worth the same amount of money they were worth before the project and, subsequently, will not be worth as much as similar or nearly similar properties which are not near this project. It seems clear that if a potential property buyer has the option of purchasing a property through which a 30-inch, high-pressure natural gas pipeline passes or a similar one a mile away for the same price, he will buy the one which is a mile away.

**AS A CONDITION FOR APPROVING THIS PROJECT, THE CPUC SHOULD REQUIRE THAT THE APPLICANT PAY FOR PROPERTY APPRAISALS (USING APPRAISERS SELECTED BY THE PROPERTY OWNER) AND REIMBURSE THE PROPERTY OWNER IMMEDIATELY FOR ANY DECREASE IN VALUE AS DETERMINED BY THE APPRAISAL.**

I4-5

Appraisals should be conducted on all properties through which or adjacent to which the pipeline passes and all properties within one mile of the compressor station and/or the separator facility.

## EMINENT DOMAIN

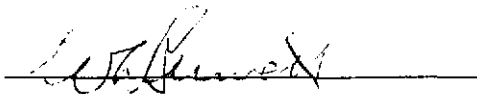
The justification for granting this project eminent domain status is that it will provide a general benefit to the people of California in the form of lower gas prices. However, nothing has been published indicating the magnitude of this benefit in dollars per year. I suspect there are two reasons for this lack of publicity: 1.) the law probably does not require it, and 2.) the amount is probably unknown. How about requiring a cost/benefit analysis?

Many of us who are potentially affected by this project can imagine what the cost of the project will be to us in noise, air pollution, visual aggravation, and loss of property values. We are totally in the dark as to the benefit that will offset our suffering.

I4-6

**AS A GUIDELINE, THE CPUC SHOULD NOT EVEN CONSIDER GRANTING EMINENT DOMAIN STATUS TO LODI GAS STORAGE UNLESS IT CAN BE CLEARLY DEMONSTRATED THAT THE ANNUAL BENEFIT TO THE PEOPLE OF CALIFORNIA IS EQUAL TO OR HIGHER THAN THE ANNUAL NET INCOME (BEFORE TAXES) EXPECTED BY LODI GAS STORAGE.**

Signed,



cc:

Richard Pombo, Anthony Pescetti, Patrick Johnston, Jack Sieglock, California Public Utilities Commission

## Responses to Comments from W.A. Bennett

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- I4-1. The CPUC has not adopted noise standards. Therefore, for this analysis, the draft EIR relies on noise standards adopted by the local jurisdictions including the San Joaquin County Noise Ordinance, as well as professional judgement. The project is required to meet these standards or, in instances where this is not possible (e.g., construction), appropriate mitigation will be required.
- I4-2. The San Joaquin Noise Ordinance was recently revised and no longer regulates noise levels at property boundaries. Instead, the revised noise ordinance requires stationary sources to achieve specific noise levels at “nearby outdoor activity areas”. The noise ordinance requirements are described on page 3.10-3 of the draft EIR. As described on page 2-45 of the draft EIR, mitigation measures proposed by the Applicant include an upper noise unit of 55 dBA at the perimeters of the compressor and separation facility sites and 45 dBA at the nearest sensitive receptors. With inclusion of these measures into the project, the proposed project and project alternatives comply with San Joaquin County Noise Ordinance requirements, as discussed in Section 3.10, of the draft EIR, except for well-drilling activities.
- I4-3. The term “dBA” refers to the A-weighted decibel scale, which weights the frequencies of a given sound to approximate the way the human ear responds to sound levels. Noise measurements and standards are typically described as noise levels that would occur over a period of time. The San Joaquin County Noise Ordinance uses hourly equivalent noise levels (Leq) as the appropriate standard. As indicated above, the noise levels from the compressor facility and separation facility meet the requirements of the current San Joaquin County Noise Ordinance. See Chapter 2, “Clarification of Major Issues”, of this final EIR for a detailed discussion of venting and compressor operation.
- I4-4. The comment concerns the potential use of electric compressors which would reduce air emissions and noise from this facility. This issue is discussed in detail in Chapter 2, “Clarification of Major Issues”, of this final EIR.
- I4-5. The issue of compensation for property and property value is not directly regulated by the CPUC. California state law contains extensive requirements regarding compensation for property. Typically, the value of property or an easement is negotiated between a buyer and a seller. Assuming that CPUC approves the project, if LGS and a landowner cannot come to mutually agreeable terms, and if CPUC also determines that it is appropriate to grant LGS authority to exercise eminent domain, appraisals will be required and the value of and effect to property will be decided through an impartial court process. During such proceedings, issues such as severance, loss of income, and reduced property values are typically addressed.
- I4-6. The CPUC has made no decision whether to approve the project. If the project is approved and if LGS cannot come to terms with one or more landowners regarding property and easement requirements, under the recently enacted Senate Bill 177, the CPUC will have to

determine whether or not to allow LGS to exercise eminent domain powers. Prior to that decision, a public hearing would be required to be held in the project area. At that time, concerns regarding the relative value of and need for the project could be addressed. As of now, LGS, along with other private utility proposals that have not yet been approved by the CPUC, will not automatically be allowed to exercise eminent domain powers even if the project is approved by the CPUC.



California Public Utilities Commission

October 13, 1999  
Lodi

Comments on the Draft EIR

NAME: ADELENE L. CATTUZZO  
ADDRESS: 51637 W. TURNER RD.  
LODI, CA 95342-9688  
TELEPHONE (OPTIONAL): UNLISTED

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:  
CA Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105  
Fax: 415-291-8943  
Email: cpuc-gas-loDI@pamsf.com

COMMENT: WE JOIN OUR NEIGHBORS IN OPPOSING THE LODI GAS STORAGE PROJECT. THIS PROJECT IS ABOUT MONEY, NOT PEOPLE. DO NOT BRING MORE CARCINOGENS INTO THIS AREA. - THE FLOOR OF OUR HOME LITERALLY ROLLED DURING AN EARTHQUAKE. WE DO NOT WANT LARGE GAS LINES ROLLING NEAR US. DO NOT DESTROY OUR DELICATELY BALANCED WATERWAYS. WHAT GIVES A "LIMITED LIABILITY" COMPANY THE RIGHT TO COME ONTO PRIVATE PROPERTY? LGS DID NOT NOTIFY ALL NEIGHBORS OF THEIR INTENT. WE ARE ANGRY THAT WE DID NOT GET A LETTER. LISTEN TO LOCAL FARMERS. THEY KNOW THE AREA! LGS EXECUTIVE SUMMARY IS AMBIGUOUS WITH THE LONG LIST OF "LESS THAN SIGNIFICANT." DECEIVING! THE COMPANY WOULD TAKE PRESSURIZED GAS THROUGH PEAT DIRT. THAT IS MORE THAN SIGNIFICANT! HAVE YOU WITNESSED BURNING PEAT? EARTHQUAKES, PEAT DIRT, PRESSURIZED GAS, DAIRY FARMS, GRAPE VINEYARDS - A SPECTACULAR COMBINATION - MORE THAN SIGNIFICANT! NO! NO! NO!

I5-1  
I5-2  
I5-3  
I5-4

I5-5

Please use the reverse side or attach any additional pages.

*Adelene Cattuzzo*



QUESTIONS?

CONTACT THE INFORMATION LINE AT 415/989-1446, EXTENSION 85

CHECK OUT THE PROJECT WEBSITE [WWW.CPUC.CA.GOV/DIVISIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM](http://WWW.CPUC.CA.GOV/DIVISIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM)



## **Responses to Comments from Adelene L. Cattuzzo**

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- I5-1. This comment concerns the potential for the project to result in the emission of toxic air pollutants, specifically formaldehyde. As part of the air quality analysis for this project, a screening level health risk assessment was conducted based on methodology recommended by the California Air Pollution Control Officers Association. This analysis is presented on pages 3.5-14 through 3.5-15 of the draft EIR. The analysis found that the highest estimated cancer risk would result from the exposure to formaldehyde emissions and equals a cancer risk of 3.4 per million people which is less than the San Joaquin Air District threshold of 10 per million people.

Using extremely conservative air quality dispersion modeling, formaldehyde concentrations from the proposed project were estimated to equal a maximum of 14.28 micrograms per cubic meter ( $\text{ug}/\text{m}^3$ ) averaged over 1 hour and  $0.57 \text{ ug}/\text{m}^3$  averaged over one year. The annual concentration of  $14.28 \text{ ug}/\text{m}^3$  is associated with an increased cancer risk of 3.4 per million people.

Formaldehyde is normally present at low levels in both outdoor and indoor air. Residences or offices that contain products that release formaldehyde to the air can have formaldehyde levels of more than  $375 \text{ ug}/\text{m}^3$ . Products that add formaldehyde to the air include particle board, fiberboard, and urea-formaldehyde as insulation (EPA web site: <http://www.epa.gov/iedweb00/formalde.html>).

No federal standard has been set for indoor air concentrations of formaldehyde; however, the Occupational Safety and Health Administration (OSHA) now regulates formaldehyde as a carcinogen. Some states have established a standard of  $499 \text{ ug}/\text{m}^3$  in their residential building codes while California has established a much lower recommendation of  $62 \text{ ug}/\text{m}^3$ . Consequently, the incremental increase in outdoor concentrations that would result from the proposed project, is well below the standards set for indoor air concentrations of formaldehyde at the federal and California levels.

- I5-2. Modern engineering and construction practices require pipelines to be designed and built to withstand the maximum expected earthquake. Consequently, such facilities are resistant to damage from ground motion.
- I5-3. As described in Section 2 of the draft EIR, all major waterways will be directionally drilled to protect both aquatic and riparian habitats.
- I5-4. The Applicant does not currently have the right to enter private property without permission, nor will they even if the project is approved. The CPUC is aware of this issue concerning the Applicant's alleged trespass.

I5-5. There are many existing pipelines in the Delta region that are buried in peat soils. Page 3.9-10 of the draft EIR identifies peat fires as a potential impact of the project and mitigation measures to reduce the impact to a less-than-significant level.





October 13, 1999  
Lodi

Comments on the Draft EIR

NAME EDWARD F. CATTUZZO  
ADDRESS 5637 W. TURNER RD.  
LODI, CA. 95242  
  
TELEPHONE (OPTIONAL): UNLISTED

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:  
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Fax: 415-291-8943  
Email: cpuc-gas-loDI@pamsf.com

COMMENT: THE LFS PIPELINE IS NOT SAFE AND IT IS NOT CONDUCTIVE TO OUR ENVIRONMENT. THE PROPOSED ALTERNATE ROUTE WILL DESTROY 280 TREES. WE JOIN OUR NEIGHBORS IN OPPOSING THE LODI GAS STORAGE PROJECT. AS I READ THE DRAFT ENVIRONMENTAL IMPACT REPORT 3.5-6 POTENTIAL FOR OBJECTIONABLE ODDRS (SIGNIFICANT) ALL WE NEED IS MORE ODDRS IN OUR AIR. ARE YOU SURE THAT EARTHQUAKES WILL NOT DISTURBE THE PIPELINE, SEPARATION FACILITY, COMPRESSOR FACILITY, P.I.E INTERCONNECT? I'M UPSET THAT A COMPANY CAN HAVE A "LIMITED LIABILITY" CLAUSE WHICH PERMITS THEM TO COME ON PRIVATE PROPERTY AND IF ANYTHING HAPPENS THEY CAN PULL OUT WITHOUT ASSUMING THEIR RESPONSIBILITIES.

I6-1

I6-2

I6-3

I6-4

OVER.

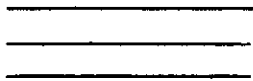


QUESTIONS?

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I'M CONCERNED WITH THE NUMBER  
OF WATER CROSSINGS WHICH CAN BE  
A SOURCE OF POSSIBLE LEVEE BREAKS.



Place  
Stamp  
Here

Judith Iklé, Project Manager  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105

## **Responses to Comments from Edward Cattuzzo**

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- I6-1. The comment concerns the potential for implementation of the preferred alternative to destroy 280 trees. As identified in Table ES-2 in the draft EIR, implementation of the Composite Route Alternative (preferred alternative) has the potential to affect 280 trees, although not necessarily destroy this number of trees. Some trees may only require pruning in order to allow for construction equipment to access certain areas. The loss of native trees, native oaks, landmark trees, heritage trees, and historical trees is evaluated in Section 3.7, “Biological Resources”, of the draft EIR. Because these trees would qualify for protection under tree ordinances in the Sacramento and San Joaquin County General Plans, damage or mortality of these trees is identified as a significant impact. Mitigation Measure 3.7-4 requires preconstruction surveys to be conducted to identify the locations of these trees and the development of a plan for the treatment of heritage and landmark trees. Additionally, the mitigation measure requires compensatory actions for trees that cannot be avoided. Compensation will be determined in coordination with the Sacramento and San Joaquin County Planning Departments and the guidelines in the county ordinances. Implementation of this mitigation will reduce adverse impacts on landmark trees or groves to a less-than-significant level.
- I6-2. The comment concerns the potential for odors resulting from operation of the project. The potential for objectionable odors is analyzed in Section 3.5, “Air Quality”, of the draft EIR. The analysis found that although leaks in the piping components could result in the emission of small quantities of odorized gas, such leaks would be unlikely; however, this impact was determined to be significant. Mitigation Measure 3.5-4 which requires the Applicant to properly construct the piping components, to inspect the pipeline quarterly for leaks, and to repair leaks within 1 month following the quarterly inspection, would reduce this impact to a less-than-significant level. This mitigation measure has been revised to further ensure that potential odor impacts are minimized. See Chapter 3, “Revision to the Draft EIR”, in this final EIR. The potential for objectionable odors to result from operation of the compressor facility is discussed in Chapter 2, “Clarification of Major Issues”, of this final EIR.
- I6-3. The CPUC believes that the federal, state, and local agencies regulating the construction and operation of the project are adequate to protect human and environmental health, including potential risk from earthquakes (draft EIR page 3.3-12).
- I6-4. The CPUC does not regulate the formation of corporations. However, despite the formation of LGS as a “limited liability corporation”, the CPUC will not allow the Applicant to simply abandon the project. Numerous state and federal laws govern the closure of such facilities.
- I6-5. River crossings have the potential to damage levees; however, several regulatory agencies with jurisdiction over these types of lands will be required to review and approve the engineering designs of each crossing (draft EIR page 3.4-21).

## Letter I7

October 18, 1999

CA Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105

Gentlemen:

Re: Lodi Gas Storage application

I am writing in reference to the "proposed project route" crossing two of my parcels of property. As of this writing, I am under the impression that the DWR is not in favor of this route and for this reason, of the four routes, this is the least favorable. Nonetheless, I wish to state that this crossing passes through **bird sanctuaries** on three islands--Staten, Twitchell and Sherman.

I7-1

My land is on Andrus Island between Georgiana Slough to the north and south of Highway 12. The Lodi Gas stakes run directly over my **syphon pipe** into Georgiana Slough! There are two "boils" on the inside levee and a **permanent seepage problem** which the local reclamation district is trying to repair. This land was inundated in the late 80's by a break in the levee on the San Joaquin River. The levees are in so-so shape and take a tremendous pressure when the winter rains and the spring run-off occur.

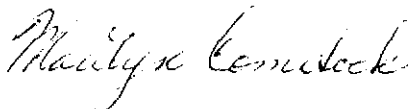
I7-2

Most of the land is peat and readily burnable. It requires flooding to be extinguished. Also peat shifts. As an example over on Grand Island which contain much less peat, my Dad installed water drainage lines in the fields about 5-6 ft. deep. Some of that pipe has worked its way up to the surface today. **The proposed pipe line is only 3 1/2 ft. deep and that is simply not deep enough.**

I7-3

I am basically opposed to the "proposed project". I prefer none of the four routes but realize the area will grow. I do prefer the "composite" or "existing pipeline" route given a choice.

Sincerely,



Marilyn Comstock  
6574 Crystal Springs Drive  
San Jose, CA 95120-4615

## **Responses to Comments from Marilyn Comstock**

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- I7-1. The California Department of Water Resources commented during the scoping phase of the project that the originally proposed pipeline alignment was not consistent with its proposed use of its property on Twitchell Island.
- I7-2. As described on page 2-14 of the draft EIR, the State Lands Commission and the State Reclamation Board will provide oversight of activities that may affect levee stability. The Applicant will be required to complete extensive engineering studies to ensure that levee stability is not adversely effected.
- I7-3. Impact 3.9-4 on pages 3.9-10 and 3.9-11 of the draft EIR describes the potential for peat fires and measures to ensure that the potential for fire is minimized. Impact 3.3-2 on pages 3.3-9 to 3.3-11 of the draft EIR describes ground subsidence and mitigation measures to ensure that the pipeline remains buried at a safe depth. Impact 3.1-2 on pages 3.1-14 to 3.1-16 of the draft EIR describes issues regarding pipeline burial, and Mitigation Measures 3.1-2 has been revised (see Chapter 3, “Revisions to the Draft EIR”, of this final EIR) to more suitably address pipeline depth. Chapter 2, “Clarification of Major Issues”, of this final EIR also provides more information about subsidence as it relates to the project.



California Public Utilities Commission

October 13, 1999  
Lodi

Comments on the Draft EIR

NAME: Joe Cotta

ADDRESS: 20200 W. Thornton Rd  
Lodi, Ca 95242

TELEPHONE (OPTIONAL): 209-369-4119

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:  
CA Public Utilities Commission  
c/o Public Affairs Management  
101 The Embarcadero, Suite 210  
San Francisco, CA 94105  
Fax: 415-291-8943  
Email: cpuc-gas-odi@pamsf.com

COMMENT: <sup>1</sup> CAN Roads be implemented on or over pipeline such as gravel, oil, or paved whenever appropriate.

18-1

<sup>2</sup> is any consideration given to the impact of a land owner who already has 2 existing P & E pipelines already side by side? Should one property owner have to bear all of the burden to serve the general public.

18-2

Please use the reverse side or attach any additional pages.



QUESTIONS?

CONTACT THE INFORMATION LINE AT 415/989-1446, EXTENSION 85

CHECK OUT THE PROJECT WEBSITE [WWW.CPUC.CA.GOV/DIVISIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM](http://WWW.CPUC.CA.GOV/DIVISIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM)



## **Responses to Comments from Joe Cotta**

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- I8-1. The pipeline will be designed to allow for the development of gravel, oil based, and paved roads over the alignment.
- I8-2. As discussed in Section 3.1, “Land Use, Planning and Agricultural Resources”, of the draft EIR, policies established by San Joaquin County, Sacramento County, and the Delta Protection Commission recommend that utility facilities should, to the extent feasible, be routed adjacent to existing facilities or other existing rights-of-way to minimize the number of utility disruptions. This section evaluates the consistency of the proposed project and project alternatives with these policies. The consideration of the effect of several adjacent utility easements traversing the private property of a single land owner is outside the scope of the EIR. Independent of the CEQA process, however, the CPUC considers project impacts on individual landowners in the context of the public benefit when making decisions on project applications. This process and opportunities for public participation in this process are described in the Draft EIR in Section 1.6, “CPUC Application Process”.