



California Public Utilities Commission

October 13, 1999
Lodi

Comments on the Draft EIR

NAME Don and Mildred Mathes

ADDRESS: 23986 Shaylynn Ct.
Acampo, Ca. 95220

TELEPHONE (OPTIONAL): 209 368-3550

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-iodi@pamsf.com

COMMENT: I was taught that the primary element in evaluating possible courses of action is to assess risk versus benefit. In using that criteria the Iodi Gas Storage Project does not meet the requirement for proceeding.

Risks:

Benefits:

I22-1

1. Disruption of farmland.

1. Profit for a private company from Texas.

I22-2

2. Air pollution (acquiring off-sites will not help the immediate area.)

2. "Promises" of lower natural gas cost.

I22-3

3. The smell of the odorant in the gas during venting

I22-4

4. Water pollution/infiltration between the water table and the gas storage layer.

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/DMSIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM



Risks (continued.)

Benefits

5. Potential for leakage, explosions, fires in the pressurized lines. (Remember the disaster near Los Angeles a few years ago. A train derailed and a large gas pipe ruptured.)
6. Noise pollution from the separator facility and the wells releasing pressure (comparable to the sound of a jet aircraft engine.)
7. Damage to already fragile waterways and levees.

I22-5

I22-6

I22-7

Please note that except for # 4, 5, and 7 these are not potential problems these are for sure consequences.

Responses to Comments from Don and Mildred Mathes

I22-1. Impacts of the project alternatives on farmland are discussed in Section 3.1 of the draft EIR.

I22-2. The comment concerns the emission of ozone. Ozone is a regional rather than a microscale pollutant. Emissions of ROG and NO_x by the proposed project will result in increases in regional ozone concentrations downwind of the project rather than in the immediate vicinity of the project site. Emissions of ozone precursors (ROG and NO_x) undergo a chemical reaction in the presence of sunlight, forming ozone several miles downwind of the emission points. Consequently, emission offsets are an effective way to reduce regional ozone concentrations. For more detailed information, see response to comment O13-3.

Additionally, in response to this comment “hot spot” modeling of NO₂ was conducted to estimate local concentrations of NO₂ during project operation. Using the results of the health risk assessment, a worse case estimate of NO₂ concentrations was developed assuming that all NO_x is NO₂, which is not the case. These estimates were then compared to the state and federal NO₂ standards. The results of the NO₂ modeling for the project and related standards are presented below.

1-hour worst case concentration:	7.1 micrograms/cubic meter
1-hour California standard:	470 micrograms/cubic meter

Annual worst case concentration:	0.71 micrograms/cubic meter
Annual federal standard	100 micrograms/cubic meter

As indicated by these screening-level modeling results, the project would not result in exceedances of either the 1-hour California standard or the annual federal standard.

The same procedures cannot be used to estimate local concentrations of ROG. Because they are “reactive” organic gases, ROG concentrations cannot be accurately estimated with nonreactive models such as SCREEN3 (the model used to conduct the health risk assessment). Additionally, there are no ambient standards for ROG, so even if accurate modeling methodology was available, the resulting information would be meaningless without comparison to adopted standards. It is also important to note that local concentrations of ROG were indirectly addressed in the screening level health risk analysis in that all of the constituents of ROG were considered a potential health risk and analyzed as part of the health risk analysis. Constituents of ROG were found not to present a health risk to nearby residents.

I22-3. The comment concerns the potential for odors related to the releasing of gas into the atmosphere. This issue is discussed in Chapter 2, “Clarification of Major Issues”, of this final EIR.

- I22-4. Because the Lodi natural gas field still retains some gas and recently contained substantially more gas, it is believed that the field can be safely used for storage. In addition, because the distance between the top of the storage facility and the bottom of the potable water (approximately 500 feet below ground surface [page 3.4-6 of the draft EIR]) is almost 1,500 feet, it is highly improbable that a gas will migrate to the potable water aquifer. As described on page 2-12 of the draft EIR, California Department of Conservation, Division of Oil, Gas, and Geothermal Resources closely regulates the drilling of wells to prevent cross contamination of aquifers.
- I22-5. Gas could leak if the pipeline was damaged. Automated systems would sense the pressure drop in the line and shut down the system (see Section 2 of the draft EIR). A fire could not occur in the pressurized line. Natural gas requires oxygen to burn. A fire could occur outside of the pipe if there was an appropriate ignition source.
- I22-6. This comment concerns noise from the operation of the separator facility and the release of pressure in the injection/withdrawal wells. The analysis of Impact 3.10-3, “Exposure of Noise-Sensitive Land Uses to Noise from Operation of the Separator Facility”, indicates that noise at the nearest sensitive receptor would be expected to be 37 dBA during release of gas from storage, which is considered the operation that would generate the loudest noise. Because this sound level is below the 45- to 55-dBA ambient noise levels measured at the site currently, the sound level would not exceed the 5-dBA significance criterion and the predicted noise level is in compliance with the San Joaquin County Noise Ordinance. Noise from the operation of the separator facility was determined to have minimum or no impact on indoor noise levels at the nearest residences.

Operation of the wells (injection/withdrawal activities) would operate without the release of pressure. Injection/withdrawal activities would not involve noise producing equipment and therefore noise from operation of the wells was not analyzed in the draft EIR.

- I22-7. As described in Chapter 2 of the draft EIR, all major waterways will be directionally drilled to protect both aquatic and riparian habitats, water quality, and the integrity of the levees.

Letter I23

-----Original Message-----

From: Paulette McGhie [mailto:Paulette@comfortwise.com]

Sent: Tuesday, October 12, 1999 11:17 AM

To: 'maa@cpuc.ca.gov'

Subject: Lodi Gas Storage Proposed Project

Mr. Mangold,

I am a concerned Land Owner in the direct path of a proposed gas line by the Lodi Gas Storage Project.

We are opposed to such a project proposed by a private Business Company that claims Emanate Domain so that they can make a profit. Especially a Company with no previous experience in this field.

I23-1

Also note that when EAGLE did the land surveys for this project, they lied and deceived land owners to the real intent of their work.

The pollution, noise, danger, decreased property value, liability issues, loss of crops and other issues are of great concern to us.

I23-2

This project is solely for the purpose of giving Lodi 2 choices of who to buy gas from. I don't think that this is a reason for taking our lands away and risking the safety of our families. There are other Energy options like Solar, Windmill and other clean and safe ways of making our area more Energy effective. We have gas already. Know one has complained about who they're buying it from. I know they don't want to trade clean air for polluted air just for a second choice.

I23-3

If you have any information in how to prevent the approval of this project and save our lands could you please advise us

Thank you for your help in this serious matter,
Paulette McGhie

Responses to Comments from Paulette McGhie

- I23-1. The comment relates to the potential use of the power of eminent domain and the Applicant's previous experience in this field. The process of eminent domain that may be available to LGS if the CPUC grants their application for a Certificate of Public Convenience and Necessity is discussed in Chapter 2, "Clarification of Major Issues", of this final EIR. The Applicant's previous experience in this field is outside the scope of this EIR, which focuses on the potential environmental impacts of the project.
- I23-2. The comment concerns potential air quality degradation, noise, danger, decreased property values, liability issues, and the potential loss of crops resulting from implementation of the project. Air quality impacts of the project are analyzed in Section 3.5 of the draft EIR. This analysis includes the evaluation of construction- and operation-related impacts and identifies mitigation measures to reduce significant impacts. Noise impacts of the project are analyzed in Section 3.10, "Noise", of the draft EIR. The noise analysis also includes an evaluation of construction- and operation-related noise impacts of the project and recommends mitigation measures to reduce significant impacts. Section 3.9, "Public Health and Safety" of the draft EIR, evaluates health and safety issues related to hazardous materials handling and the potential for rupture or explosion of the natural gas pipelines and facilities. This section includes an overview of the safety features of the project as well as applicable state and federal safety requirements. Mitigation measures are presented to reduce significant public health and safety impacts. Impacts to agriculture, including the potential for disruption of agricultural production, is evaluated in Section 3.1, "Land Use, Planning, and Agricultural Resource", of the draft EIR. This section also identifies mitigation measures to reduce significant agricultural impacts.

Changes in property values and liability issues are outside the scope of this EIR. These issues together with other social and economic project issues are considered by the CPUC in its decision-making process. Section 1.6, "CPUC Application Process" of the draft EIR, describes this process and opportunities for participation. The CPUC is aware of incidents of alleged trespassing by the Applicant.

- I23-3. The commenter contends that the purpose of the project is to give Lodi choices of whom to purchase natural gas from. As discussed in the draft EIR in Section 1.2.2, "Background", population growth in California and the conversion of electric power plants from oil to natural gas to reduce air emissions has increased the demand for natural gas. On occasion, especially during periods of cold weather, pipeline companies cannot get enough gas into their pipelines to meet the demand and are forced to cut off supplies. The issue of natural gas pipeline capacity and the ability to meet increasing demand is a state-wide issue and not specific to the Lodi area. With the passage of recent legislation encouraging the development of independent gas storage facilities, LGS's objectives include providing multiple-turn gas storage that allows for the injection and withdrawal of gas several times within a day, real-time balancing of gas supply to meet customer needs, and market-based pricing of gas storage services. These objectives focus on large commercial and industrial customers and

groups of smaller customers who arrange, on their own or through agents, to purchase their own natural gas supplies directly from gas producers, then pay pipeline companies and local gas utilities to deliver the purchased gas to the customer's facilities. These customers may benefit from purchasing natural gas storage service as they could purchase and store gas when prices are relatively low and supplies are relatively high and then withdraw the gas from storage for use when supplies are low and prices are high.

Letter I24

October 7, 1999

Ray McNeal & Carol McNeal

6361 west Acampo Road

Lodi, Ca 95242

Dear Judith IKL'E, CPUC PROJECT MANAGER,
concerning LODI GAS STORAGE PROJECT .

We live at 6361 West Acampo Road Lodi.

The LODI GAS STORAGE PROJECT;

Plan #1 Proposed Project

Plan #3 Existing Pipeline Corridor Alternative

Plan #4 Composite Route Alternative

All of those routes will go down NORTH SIDE OF WEST ACAMPO ROAD.

Between RAY ROAD and I5 INTERSTATE HIGHWAY.

We live on NORTH SIDE OF WEST ACAMPO ROAD. Our house is 28½ FEET
from NORTH SIDE OF WEST ACAMPO ROAD.

We do not want to live this close to a 24" to 30" High Pressure
Gas Pipeline.

We have told several representatives of L.G.S., a Huston Texas
corporation, we feel unsafe with this pipeline so close to
our home. We are told unless we "SIGN UP " our property will
be taken by Power of Eminent Domain.

I24-1

I24-2

Due to our age and health, we can not be out at night to attend
the meetings. For that reason we are telling our fears of this
happening by mail.

Sincerely

Ray McNeal
Carol McNeal

Responses to Comments from Ray and Carol McNeal

I24-1. This comment concerns the safety of the pipeline in proximity to residences. Section 3.9, “Public Health and Safety”, of the draft EIR evaluated the potential risk to public safety from pipeline rupture that could lead to an explosion resulting in property damage or fatalities. This section includes an overview of the safety features of the project as well as applicable state and federal safety requirements. Specifically, this section describes the safety standards contained in Chapter 49 Part 192 of the Code of Federal Regulations pertaining to the transportation of natural gas by pipeline. Class location key pipeline design factor, is discussed, which requires a natural gas pipeline to withstand pressure at a greater percentage of the maximum operating pressure, based on the number of residences located within 220 yards of the pipeline.

The analysis summarized the rate of public injuries from pipeline safety incidents for the estimated 1.7 million miles of gas pipeline in service. Applying this industrywide standard to the proposed 33 miles of pipeline, the proposed project would result in less than 0.02 injuries to facility operators and the nearby public per year, or approximately 0.5 injuries over the 30-year life of the project. To offset this limited risk of injury, several measures have been incorporated into the project design including burying the pipeline in exceedance of U.S. Department of Transportation standards to provide for future agricultural use of the area, including deep-ripping activities. Additionally, in accordance with federal regulations, aboveground markers will be placed along the pipeline corridor. Although the potential for accidents can never be ruled out entirely, the pipeline will be designed to modern engineering standards and to exceed all safety requirements.

I24-2. The comment concerns the potential use of the powers of eminent domain. The process of eminent domain is described in Chapter 2, “Clarification of Major Issues”, of this final EIR.



California Public Utilities Commission

October 13, 1999
Lodi

Comments on the Draft EIR

NAME: Louis A. Mello
ADDRESS: 9303 W. WOODBRIDGE RD.
LODI, CAL. 95242

TELEPHONE (OPTIONAL): 209-369-9314

COMMENT: It sounds like
a lot of P.G. ^{and} E,

BULL SHIT

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101 The Embarcadero, Suite 210
San Francisco, CA 94105
Fax: 415-291 9943
Email: cpuc-gas-loDI@pamsf.com

I25-1

Please use the reverse side or attach any additional pages.



QUESTIONS?

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Responses to Comments from Louis Mello

I25-1. This comment is not germane to the EIR. No response is required.

Letter I26

Anita J. Merlo
P.O. Box 627
Woodbridge CA 95258
home-(209) 368-7951
work-(209) 465-9022
fax-(209) 465-9720

November 10, 1999

VIA FAX 415-291-8943

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

RE: Lodi Gas Storage,
LLC's Application for Certificate of
Public Convenience and Necessity for
Construction and Operation of Gas
Storage Facilities Application 98-11-012

Dear Public Utilities Commission:

I own property along the proposed public right-of-way route alternation figure 2-12b of draft EIR Sch#99022065.

I own property on West Woodbridge Road on Brack Tract and on Acampo Road.

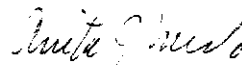
I am opposed to this project. The draft EIR does not adequately address the financial impacts of this project on property owners. In addition, in the Delta where my property is on Brack Tract, the soil is peat and the gas line would pose a hazard due to subsidence that occurs with this soil.

I26-1

I26-2

I am opposed to this project and urge you to reject this proposal.

Sincerely,



Anita J. Merlo

AJM/gh

Responses to Comments from Anita Merlo

- I26-1. The commenter notes that the draft EIR does not adequately address the financial impacts of the project. Effects analyzed under CEQA must be related to a physical change in the environment (State CEQA Guidelines Section 15358[b]). Economic or social effects are not considered environmental effects under CEQA. These effects need only be considered if they would lead to an environmental effect. Financial impacts of the project together with other social and economic project issues are considered by the CPUC in its decision-making process. Section 1.6, “CPUC Application Process” of the draft EIR, describes this process and opportunities for public participation in this process.
- I26-2. Additional information has been provided regarding peat soils and current subsidence rates in the Delta in Chapter 2, “Clarification of Major Issues”, of this final EIR. Because a final alignment has not been selected and the project has not been approved by the CPUC, detailed soil engineering studies have not yet been completed. If the proposed project or a project alternative is approved by the CPUC, the Applicant will be required to complete soil engineering studies and pipeline engineering designs and submit them to the CPUC for approval. The Applicant recognizes that reburial of the pipeline, to meet the minimum burial depth of 4 feet, may be necessary during the life of the project. Mitigation Measure 3.3-1 describes reasonable measures to ensure that the pipeline will be maintained at a safe depth and will not interfere with existing and future agricultural practices.

SCOM -

Letter I27



California Public Utilities Commission

October 13, 1999
Lodi

Comments on the Draft EIR

NAME James B. Moore Jr.
ADDRESS 166 W. E. ST.
GALT, CA. 95632
TELEPHONE (OPTIONAL): 209-745-5611

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:
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101 The Embarcadero, Suite 210
San Francisco, CA 94105
Fax: 415-291-8943
Email: cpuc-gas-lo di@pamsf.com

COMMENT: After attending meeting, I noted with dismay that there was NO reference of Category of the interaction of Deep Well Water vs. Natural GAS in very shallow pockets.

I would call this - Poltrier/Burella GAS pocket (at 2000 ft.) a SHALLOW pocket.

Most GAS fields are at 4,000 to 5,000 feet depth and do not dry up in 2 years to 7 years.

We (the Agricultural Community) have been drilling wells to 1000 ft. depth for the past 30 years. I would like to see your draft EIR address these potential MITIGATIONS.

R.S. I can show you NAT GAS Leaks in AG wells within 10 miles of this field.



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[Handwritten signature]

I27-1

Responses to Comments from James B. Moore

I27-1. Because the Lodi natural gas field still retains some gas and recently contained substantially more gas, it is believed that the field can be safely used for storage. In addition, because the distance between the top of the storage facility and the bottom of the potable water (approximately 500 feet below ground surface [page 3.4-6 of the draft EIR]) is almost 1,500 feet, it is highly improbable that a well driller would inadvertently drill into the storage reservoir. It is possible for wells to penetrate shallow deposits of natural gas. It is common for natural gas to move through fractures in bedrock, however, there is no evidence that formation proposed for storage is fractured and leaking.

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.

Letter I28

From: TAFFYO@pop0101.promedia.net
Sent: Wednesday, October 27, 1999 10:24 AM
To: cpuc-gas-lodi@pamsf.com
Subject: Proposed Lodi Gas pipeline

Dear Ms. Ikle:

I am writing to express my concern over the proposed Lodi Gas Storage pipeline. I live in Acampo, one-half mile away from the proposed compressor station. This two story tall building is proposed right next to a busy airport (currently that property is part of the airport). What happens when a plane or ultralight runs into it? What happens when a skydivers chute tangles or hits it? I am aware that to quiet the uproar they have created with this project, Lodi Gas Storage and LLC have made changes in regards to placement of the pipeline and emissions from the station. It's only going to emit 75 tons per year now of toxic and potentially cancer causing byproducts into the local air. And that's OK? Where do you draw the line? How much waste spewing into the air is OK? I can tell you that 75 tons a year that close to my home and children is not OK. Lodi Gas Storage does not have to live next to the mess their creating here. We do.

I28-1

Last Saturday the Lodi-New Sentinel printed a front page article extolling the many virtues of the gas storage project already built in Gridley California. How the locals love their new pipeline and the economic boost it gave to the area. The article made an attempt to compare that project with Wild Goose Gas Storage to our currently proposed one. However it failed to compare the fact that Gridley's compressor station is ten miles out of town in the middle of nowhere in someone's rice field and ours will be in the middle of Acampo, next door to hundreds of families... a community, NOT in the middle of nowhere.

I28-2

I know that we (the residents of Acampo) could protest all we want and couldn't stop big business from doing this project. However, couldn't the compressor station be placed somewhere else? Maybe out in the middle of nowhere, where it wouldn't be an accident waiting to happen. Where it wouldn't be such an environmental hazard. There is no place in the middle of a community for this.

I28-3

You hear a lot around here about the disturance of our areas biggest product: grapes. About uprooting vineyards. But I think the point is being missed. What about the potential hazard of explosion, fire, toxic emissions. How having that here will affect our health and the health of our children. No one knows yet.

I28-4

Thank you for your time.
Stephanie Oelsner

Responses to Comments from Stephanie Oelsner

I28-1. The compressor facility would be approximately 35 feet tall and would be screened by trees; therefore it is likely that an ultralight pilot would be able to see the facility from some distance and would be able to safely avoid it. Based on observations at the parachute center, it appears that the parafoil style parachutes used by most parachutists are highly maneuverable and can be controlled to avoid the proposed project facilities. When observed during preparation of the draft EIR, most parachutists landed within a 100 feet of the parachute center, which is a multi-story building.

Since publication of the draft EIR, the Applicant has received a determination from the FAA that the alternate compressor site (at Lind Airport) would not interfere with general aviation activities.

I28-2. 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 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 (ug/m^3) averaged over 1 hour and 0.57 ug/m^3 averaged over one year. The annual concentration of 14.28 ug/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 ug/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 ug/m^3 in their residential building codes while California has established a much lower recommendation of 62 ug/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.

- I28-3. This comment concerns alternative locations for the compressor facility. As discussed in Section 2.2.4, “Project-Specific Location Alternatives” of the draft EIR, alternate compressor facility sites were evaluated based on a variety of criteria including noise sensitivity, presence of biological resources, and compatibility of existing land uses among other criteria. Table 2-1 summarizes the initial results of the qualitative evaluation for alternate compressor sites. Only two locations, the proposed compressor location and the alternate compressor location were determined to meet all the initial evaluation criteria. All other potential compressor locations failed to meet at least two of the evaluation criteria and were therefore eliminated from further evaluation.
- I28-4. The comment concerns the potential health and safety impacts of the project. Section 3.9, “Public Health and Safety” of the draft EIR, evaluated the potential risk to public safety from pipeline rupture that could lead to an explosion resulting in property damage or fatalities. This section includes an overview of the safety features of the project as well as applicable state and federal safety requirements. Specifically, this section describes the safety standards contained in Chapter 49 Part 192 of the Code of Federal Regulations pertaining to the transportation of natural gas by pipeline. Class location key pipeline design factor is discussed, which requires a natural gas pipeline to withstand pressure at a greater percentage of the maximum operating pressure based on the number of residences located within 220 yards of the pipeline.

The analysis summarized the rate of public injuries from pipeline safety incidents for the estimated 1.7 million miles of gas pipeline in service. Applying this industrywide standard to the proposed 33 miles of pipeline, the proposed project would result in less than 0.02 injuries to facility operators and the nearby public per year, or approximately 0.5 injuries over the 30 year life of the project. To offset this limited risk of injury, several measures have been incorporated into the project design including burying the pipeline in exceedance of U.S. Department of Transportation standards to provide for future agricultural use of the area, including deep-ripping activities. Additionally, in accordance with federal regulations, aboveground markers will be placed along the pipeline corridor. Although the potential for accidents can never be ruled out entirely, the pipeline will be designed to modern engineering standards and to exceed all safety requirements.

Letter I29

2013 Tyler Way
Lodi Ca 95242
209 333-9204
November 3, 1999

Judith Ikle
Project Manager
CPUC
101 The Embarcadero
San Francisco Ca 94105

Dear Ms. Ikle:

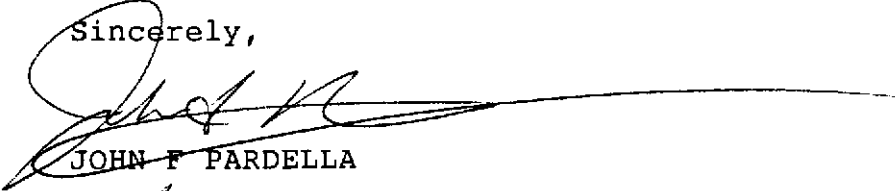
We are very concerned citizens about the Gas Pipeline which is being proposed for the Lodi Area.

We send to you are vote against the Gas Pipeline. We do not want a Texas Company coming into our area, ripping up our agricultural land and putting the citizens of the area at risk for potential leaks and/or fires. We do not see any benefit to our community or tothe economy in this area. Many of our local and state leaders are also against this project.


I29-1

We strongly hope that the PUC votes this project DOWN.

Sincerely,



JOHN F PARDELLA



CAROLE M PARDELLA

Responses to Comments from John and Carole Pardella

I29-1. The commenter expresses opposition to the project based on concerns related to the disruption of agricultural operations, risk of potential leaks and fires, and lack of economic benefit to the community. Impacts to agriculture, including the potential for disruption of agricultural production, is evaluated in Section 3.1, “Land Use, Planning, and Agricultural Resources,” of the draft EIR. This section also identifies mitigation measures to reduce significant agricultural impacts. Section 3.9, “Public Health and Safety”, of the draft EIR evaluates health and safety issues related to hazardous materials handling and the potential for rupture or explosion of the natural gas pipelines and facilities. This section includes an overview of the safety features of the project as well as applicable state and federal safety requirements. Mitigation measures are presented to reduce significant public health and safety impacts.

Community economic benefit from the project is outside the scope of this EIR. This issue together with other social and economic project issues are considered by the CPUC in its decision-making process. Section 1.6, “CPUC Application Process”, of the draft EIR describes this process and opportunities for participation.

Letter I30

From: JOSEPH P PETERSEN [jppetersen1@juno.com]
Sent: Wednesday, November 10, 1999 10:20 PM
To: cpuc-gas-lodi@pamsf.com
Subject: COMMENTS ON THE DRAFT EIR

I would like to know the impact to the local community if we are classified as having "severe" ozone pollution. Could it force people in the local community to suffer (incur more costs for more stringent emission equipment, or being shut down) by the additional restrictions mandated or will LGS be forced to scrub or shut down. (please see attached article). I would hope that you will see that Lodi Gas Storage would be restricted in their emissions before I would be told not to use my wood burning stove to heat my home. Not only do I enjoy fires, it is an inexpensive way to heat my home.

I30-1

I don't think adequate sound monitoring has been done at the separation facility. Location or the well site location. Long term sound level measurements should be conducted. Without long term sound level measurements, the development cannot be planned and designed to minimize noise impacts on neighboring noise sensitive areas (receptors). Will the project produce large "single event" noise releases and how will the local community be protected from these potentially harmful noises?

I30-2

Why isn't the separation facility located at the compression station, like Wild Goose? If cost to the applicant is the reason, what are the increased costs to the applicant? And how much of an increase is it? I would also like to know what the cost to the surrounding residents on Jahant road are (lower property value, peace of mind, quality of life)?

I30-3

My husband is a firefighter, on 3.11-2 it states LGS has agreed to familiarize the department with LGS's facilities, training, and provide equipment. Could you provide more details on the above... When will the department be "familiarized", how much training will be provided and how often, how much will be allocated by LGS for equipment, and most importantly is The Liberty Fire Department capable, with equipment and manpower, to adequately protect the people if an emergency situation were to occur.

I30-4

Smell - Could this project negatively affect the quality of wildlife and or humans due to the amount of odor produced. Can this be limited?

I30-5

My home is located very close to where the wells will be drilled. I believe it is unacceptable to drill 24 hours a day. Mitigation Measure 3.10-2 states that applicant and construction contractor shall limit the hours of well drilling to these hours... What are "these" hours? This is a state regulated activity, are there any state regulations limiting noise and the length of time noise can be made? I believe the well drilling should be restricted to the same time frames as pipeline construction, Monday - Saturday 7:00a.m. to 7:00p.m..Drilling at these hours will still have a significant impact on the quality of life for humans as well as wildlife.

I30-6

2.2.2

Liberty Island alternative: states the reservoir is deeper and has a more complex stratum that would require more extensive and costly compression. What is the cost of this compression vs. the cost of 33 miles of

I30-7

pipeline. How much more compression would it require? How does the compression of this alternative compare to the compression required to push 500mmcf per day through a 24" pipe through an additional 33 miles of pipeline. Is the Liberty Island alternative much more attractive when it comes to the disruptions associated with the 33 mile pipeline and the demographics of Acampo versus Liberty Island? The winters project states that it is located in a more residential area therefore should not be an alternative. Should this same standard be used for the Lodi project? Is the Lodi project much more densely populated than the Winters location? Would this alternative have less of an impact on the people of California...on the wildlife of California?

(cont'd)

Sherman Island Alternative: Again more compression, more pollution and more noise. How much more compression? Can the pollution be eliminated with scrubbers? How many sensitive receptors would be within a 1 mile radius of the Sherman Island facility? Could both the separator and compressor be combined in one area? Could this be mitigated with sound detonation? How many sensitive receptors are there within a 1 mile radius of the applicant's multiple facilities? Could this alternative have less of an impact on the people of California...on the wildlife of California?

I30-8

Winters Alternative: This field is located in a more residential area. What is the population of this alternative if it was surrounded with a 1 mile buffer. What is the population of Lodi Gas Storage project if the same 1 mile buffer approach was used? I would like to see maps of both the Winters alternative and the LGS project, showing the field, the separation facility and the compression station and the 1 mile buffer showing the population within. This alternative also boasts that it would not be consistent with the current land uses. Is the Lodi Gas Storage Compressor station and separation facility consistent with current land uses?

I30-9

There is a very large tree Northwest of my home. It is the home of 2-3 hawks, and I hope construction does not force them to move elsewhere. As I have said before, this is country living, and country is why I chose to live here.

I30-10

What can I do if the applicant is unresponsive to my requests or complaints during construction or when the project is up and running.

I30-11

Sincerely,

Jeannette Petersen

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Attachment to Letter I 30

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Pollution reaching 'severe' level

Valley smog improves, but 'nowhere near the standard'

By Jim Nickles

Record Staff Writer

The San Joaquin Valley has failed to meet the stringent standards of the Clean Air Act and is likely to be reclassified by the federal government as having "severe" ozone pollution, air-quality officials said Tuesday.

And that could mean additional restrictions on cars, trucks and other smog sources, as well as on industries and agriculture.

This comes despite the Valley having its second-best smog season in at least a decade.

"It's going to be a challenge, but we are committed to getting there," said Allan Hirsch, a

spokesman for the California Air Resources Board.

Mobile sources — cars and trucks — remain the biggest source of air pollution in California. The state already has the cleanest cars and fuel in the world, but the number of cars on the road, and the miles they are driven, increases every year, officials said.

The state will be imposing new emission limits on diesel trucks starting in 2002, so that may help, Hirsch said.

The Valley's biggest air-quality challenge is ozone, a toxic gas formed when emissions from cars and other sources are cooked in

the summer heat. Ground-level ozone causes a variety of respiratory and other health problems, from wheezing and chest pain to eye irritation and nausea.

Longterm exposure can cause permanent lung damage.

The Valley violated the federal one-hour ozone standard more than two dozen times this summer, according to preliminary numbers released by the San Joaquin Valley Air Pollution Control District. The 27 violations are the second fewest of any year since 1984, said Evan Shipp, the district's meteorologist.

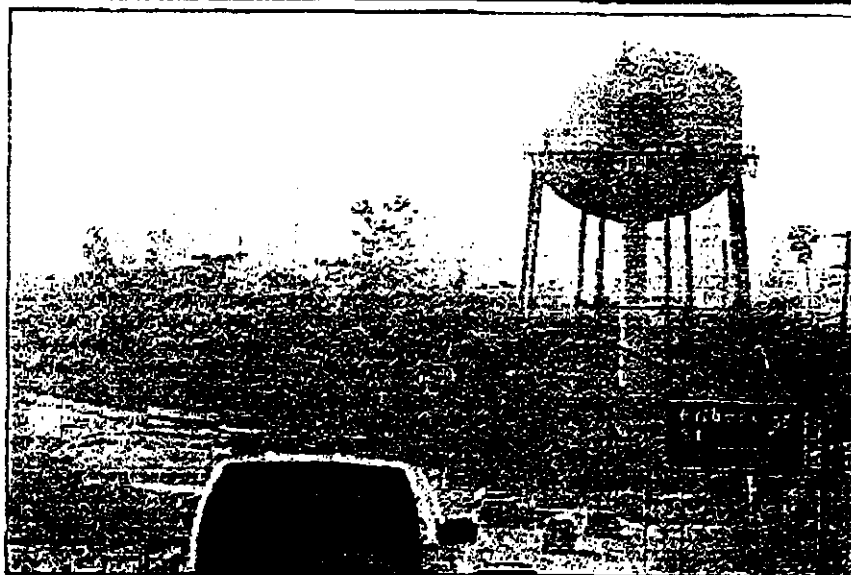
Only 1997 was better, when the

Please see POLLUTION, Back page

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Record photo by CLIFFORD ORT

HAZE SETTLES IN: Downtown Stockton is obscured by hazy skies as seen in this view from the Crossstown Freeway near Highway 88. The Valley has failed to meet the stringent standards of the Clean Air Act, which could lead to the area being listed as having "severe" ozone pollution.

POLLUTION

Continued from A1

standard was exceeded 18 times, he said.

"It looks like the air is getting better, believe it or not," Shipp said. Unfortunately, he added, "We're nowhere near the standard."

The district faced a Nov. 15 deadline to meet the ozone standards of the Clean Air Act. To be in attainment, the district could have no more than three violations at any one monitoring station over a three-year period.

But the district had more than three violations at several monitoring sites in 1997 and 1998, and more violations occurred this year, officials said.

The U.S. Environmental Protection Agency has already notified the district that it will redesignate the eight-county basin — which extends from Stockton to Bakersfield — from having a "serious" to a "severe" ozone problem under the Clean Air Act.

In California, the Sacramento area also is classified as having "severe" ozone pollution. The Los

Angeles basin is classified as "serious" for ozone.

The new classification gives the San Joaquin Valley until 2004 to meet the Clean Air Act, but the district and the state Air Resources Board need to devise new measures to reduce pollution, Hirsch said.

In the fall, the Valley's major pollution problem becomes particulates, tiny bits of soot and dust that create a brown haze.

Particulates come from a variety of sources, including construction activities, agricultural burning, and vehicle and industrial emissions. In recent weeks, particulate pollution has been worsened by several wildfires and the Wesley fire, officials said.

In the central and southern portions of the Valley, particulate pollution in recent days has been close to an unhealthy 100 on the Pollutant Standards Index, said Josette Merced Beilo, a spokeswoman for the district. In the northern Valley, including Stanislaus and San Joaquin counties, the PSI has been in the "moderate" range of between 50 and 100.

The forecast for today is for a

PSI of 77 in the northern region and for 101 in the central and southern regions, including Fresno and Bakersfield, Merced Beilo said.

Stockton resident Ed Ware, out for his afternoon walk around Victory Park, said he can feel it in his lungs when air-quality declines. Despite the persistent haze, the air Tuesday was pretty good, he said.

"There's days when it's bad," said Ware, a food-service worker for Stockton Unified School District. "You can feel it. It's heavier."

But the brown gunk in the air bothered another walker.

"It's lousy," said Liz Swain, out for a stroll with her mother and grandson. "All you have to do is look at it — it's ugly today."

Shipp said the haze may dissipate over the next few days, as the prevailing winds shift from the east to the west. The westerly winds do a better job blowing pollution out of the Valley, he said.

"The Valley is just a dusty place, and it will stay that way until it rains," Hirsch said.

Responses to Comments from Jeanette Peterson (November 10, 1999)

I30-1. The comment concerns the reclassification of the San Joaquin air basin as a severe nonattainment area for ozone. The commenter is correct in noting that the San Joaquin Valley Air Basin will be redesignated by the U.S. EPA from a serious to a severe ozone nonattainment area. This redesignation is expected to occur no later than May 2000. As a severe ozone nonattainment area, the San Joaquin Valley Unified Air Pollution Control District will have until 2005 to implement measures that will bring the Air Basin into attainment with the 1-hour federal ozone standards. Under the new designation, the Applicant would still be able to construct their proposed facilities. This new designation will require the Air District to develop and implement more stringent emission controls for stationary and area sources and will increase the offset requirements from a ratio of 1.2:1.0 to a ratio of 1.3:1.0 for offsets obtained within 15 miles of a source; however, it is unclear whether the proposed project will be permitted prior to the redesignation from a serious to a severe area. If emission offsets are unavailable, then the Applicant would be unable to build the proposed facility.

I30-2. Noise monitoring done at the various project sites is considered acceptable monitoring by acoustic professionals. The information provided by the Applicant was thoroughly reviewed by impartial experts retained by the CPUC. It is highly unlikely that additional noise measurements would provide useful information. The ambient noise levels recorded at the sites were very quiet at most locations and are typical of rural areas. Dominant noise characteristics included intermittent traffic, equipment, and airplane related noise. These noise sources would not be expected to vary significantly. Several 24-hour measurements were taken and these measurements also confirm expected findings.

While there is some potential for relatively infrequent pressure releases from the compressor facility, these releases will be muffled by the 10-foot-deep bermed pit in which they will take place. Noise from venting operations will not exceed the noise levels predicted for normal operations. See Chapter 2, "Clarification of Major Issues", for a description of these venting operations and the measures taken to reduce noise.

I30-3. The separation facility is located at the gas field because of the need to reinject any water that is drawn from the formation with the gas during withdrawal operations. Locating the separation facility at the compressor facility would require an increase in the number of pipelines between the well field and the compressor location, thereby increasing both overall project cost and environmental impact.

I30-4. This comment concerns the need for additional training and equipment for potential impacts associated with project operation. LGS has committed to familiarize fire department personnel with project facilities, assist in training local fire department personnel to respond to emergencies involving natural gas facilities, and providing equipment as necessary, to respond to potential emergencies at project facilities.

LGS will meet with local fire district personnel, emergency medical services providers, and law enforcement agencies during project construction to familiarize them with the various control and safety systems designed into project facilities, substances that will be stored at project facilities, and the emergency procedures which LGS will implement. Additionally, communications links and protocols will be established for notification and response in the event of emergencies. These protocols will include notification lists of residents in the immediate vicinity of project facilities. The CPUC has proposed an additional mitigation measure to address this issue. See Chapter 3, “Revisions to the Draft EIR”, in this final EIR.

Meetings between LGS and the emergency response service providers and local law enforcement personnel will be conducted on an annual basis as needed, to train new personnel. LGS will also coordinate with these agencies to conduct annual drills simulating various emergency conditions.

At this time it is unknown how much, if any, equipment additions or improvements will be required by the fire districts to respond to emergency situations at the proposed facilities. Through the coordination efforts described above, the fire districts and LGS will identify equipment needs.

The ability of the Liberty Fire District and other fire districts in the area to adequately protect the people in the event of an emergency at the proposed facilities will be determined through the cooperative effort of education and training between LGS and the fire districts.

- I30-5. As described in Chapter 2, “Clarification of Major Issues”, of this final EIR, the facilities will be frequently monitored to prevent leaks. Any gas produced from typical depressurization (“venting”) operations will be “flared” or burned to eliminate potential odors. See Chapter 2, “Clarification of Major Issues”, of this final EIR for more information.
- I30-6. Mitigation Measure 3.10-2, initially limited well-drilling activities to daytime hours. However, comments provided by the California Division of Oil, Gas, and Geothermal Resources indicate that it is not feasible to stop well drilling activities. The mitigation measure has therefore been modified to allow certain well-drilling activities to proceed over a 24-hour basis, while minimizing the potential for noise impacts. See Chapter 3, “Revisions to the Draft EIR” for a description of the revised mitigation measure.
- I30-7. Section 15126 of the state CEQA Guidelines states that alternatives considered in an EIR should focus on those alternatives that would reduce significant impacts as compared to the proposed project. While the Liberty Island gas field may reduce some impacts associated with the transmission pipeline, other impacts, such as air quality impacts would be increased. Therefore, the analysis is appropriate and no further analysis is warranted.
- I30-8. See response to comment I30-7 above. It is important to note that the term “sensitive receptors” applies primarily to noise and toxic air emission analyses. For these impact categories, a 1-mile radius around project facilities is not a meaningful statistic. Given the noise levels produced at the compressor facility, increased noise levels would be

imperceptible within approximately 1,500 feet of the facility. There are very few residences within this distance at either the Sherman Island site or the compressor sites analyzed in detail in the draft EIR.

I30-9. See responses to comments I30-7 and I30-8 above. Again, the purpose of the alternatives analysis under CEQA is to identify alternatives that reduce significant impacts as compared to the proposed project. While detailed plans have not been developed by the Applicant for this site, the information provided to the CPUC indicates that this alternative would not substantially reduce or avoid the significant impacts associated with the proposed project; it would simply relocate those impacts.

I30-10. Impact 3.7-12 of the draft EIR identifies the potential for impacts to nesting raptors and Mitigation Measure 3.7-7 describes appropriate mitigation to ensure that any impacts to nesting raptors is minimized and reduced to less-than-significant levels.

I30-11. The CPUC Energy Division will be responsible for monitoring compliance with mitigation measures and project description features during project construction. Notification packets required to be distributed during construction (see Mitigation Measure 3.10-1) will include the name and telephone number of CPUC representatives who can be contacted to request information, answer questions, and register complaints. The CPUC will also retain some jurisdiction during project operations, along with other state and federal agencies.