

Letter I9

Judith Ikle', Project Manager
c/o Public Affairs Management
101 The Embarcadero, Suite 210
San Francisco, California, 94105

Dear Ms Ikle',

Please find the following my comments on the draft EIR. Please address my comments and questions in the final EIR. Thank you.

- * ES. 7 Alternatives to the Project: The EIR states that no environmental impacts would transpire. **Please address what actual harm would come to the area if this pipeline project were not approved.**
- * #3.1 Land Use, Planning and Agricultural Resources: "Land uses near Lind Airport are governed by the Airport Land Use Plan. The airport plan is intended to ensure that no new land use resulting in a a hazard to the health or safety of persons on the ground is permitted within any part of the airport's are of influence"

I9-1

Impact 3.1-26: Potential Inconsistency with Plans and Policies: "The location of the compressor facility at the airport site under the alternative route would conflict with airport land use plan. The land use plan specifically prohibits "electrical and natural gas generation and switching and natural gas and petroleum pipelines in the lands underlying the Approach and Transitional Surfaces." This is considered significant impact.

Mitigation Measure 3.1-3 would make this impact less than significant by obtaining the permit or amending the land use plan.

I9-2

This is absolutely remarkable that such a statement can be printed and considered as a mitigation. The California Public Utilities Code demands that the Airport Land Use Commission formulate a plan to safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general. Defiling a law to insure public safety for this project is irrational, and unacceptable. There are homes and a freeway within one quarter of a mile of the proposed facility. The buildings would be in the left hand approach for pilots using the diagonal runway. The gas venting would create an additional visual hazard in a uncontrolled airport. Adding the risk of an airplane accident to a project that has inherent mechanical and human error risks displays total disregard for the community in which this company wishes to place this project. The most notable crashes of recent occurred in 1998 and 1999, both involving fire. In addition to the likelihood of explosion and fire, hazardous materials stored at the site would be released. Please do not accept this mitigation.

- * #3.9.1 Public Health and Safety: The EIR addresses only the safety record of distribution and transmission pipelines. It addresses only incidents and nature, not outcomes in terms of lives harmed and lives lost. Not printing injuries and fatalities appears to be an omission. In addition, facility accidents are not addressed at all. This also appears to be an omission.

Please include in the final EIR all injuries and fatalities associated with both pipelines and related facilities, specifically separator and compressor, within the same reporting period. Please include all facility incidents for the same period, and address cause and environmental harm. Please identify what harm the release of the hazardous materials into the environment would be, should there be a fire and explosion at the compressor facility. Please do not minimize this. Should this project be approved as presented, the individuals who live within the area of potential harm need to know. Please include what harm will come to nearby vineyards should they be showered with lubricating oil, as this once occurred with the McDonald Island facility. I am made aware of these omissions by the fact that recent incidents have occurred at the PG and E facility in the Delta. At the McDonald Island facility, a mechanical failure resulted in explosion and fire. I was unable to obtain reports from PG and E as they were considered protected, however, newspaper articles revealed the following about the October 1, 1993 accident.

19-3

***"The explosion was felt as far north as Lodi and as far south as Livermore"**

***"The explosion knocked a 5,000? pound cap off the separator and launched it a quarter of a mile through an adjacent cornfield leaving a 6 foot wide path."**

Another report indicates the cap imbedded itself in a levee.

***PG and E Affairs Representative Rob Lechner said " a 1,000 pound chunk of metal landed in a driveway of a neighbor's house."**

Other newspaper articles indicate that PG and E's McDonald Island facility is no stranger to problems, citing incidents in 1981 and 1982. An unprovoked event, (some mechanical failure,) resulting in explosion and fire of the same magnitude as the McDonald Island incident, transplanted to a location less than one quarter of a mile from the freeway, homes and the airport would prove disastrous. Individuals using the freeway would be harmed if a 1,000 pound chunk, at great velocity struck the freeway. Please bear this in mind. The only appropriate place for such facilities is in remote locations.

- * #3.12.2 Regulatory Setting: The San Joaquin County General Plan requires that "development proposals along scenic routes shall not detract from the visual and recreational experience."

A scenic wine route that will incorporate a scenic drive with opportunities for visitors to stop at the local wineries is being planned. The route will take visitors to the area down Peltier Road. The EIR states that the potential exists for the compressor facility to have a significant impact on the visual character of the project area. Mitigation Measure 3.12-1 addresses the issue through use of shielding vegetation.

While the mitigation measure does incorporate shielding the industrial site, it cannot mitigate the visual, olfactory and auditory experience of the gas venting. In addition, vegetation takes many years to reach full maturity. The impact on the blossoming wine tour, wine tasting industry at this time cannot be mitigated.

Thank you for the opportunity to address through this and the public meeting forums my strong opposition to this project. It has been handled with insensitivity by the proponents from the onset. The mitigation measures in the draft EIR further reveal how little concern there is for the existing community, culture and greater environment in which they wish to place this project. Please take my concerns into consideration when reviewing this project's merit. Not every utilities related project will be necessary and deserving of a Certificate of Public need. I respectfully request that you deny the Lodi Gas Storage proponents theirs.

Sincerely,



Laddie Erbele
720 Cypress Run
Woodbridge, California 95258
(209) 339-0521

Responses to Comments from Laddie and Brian Erbele

- I9-1. As stated in the draft EIR, if the project were not approved, none of the potential environmental impacts described in the draft EIR would occur. No other effects would result.
- I9-2. Although the project facilities are located partially within areas under the jurisdiction of the Airport Land Use Commission, the compressor facility itself is on airport property, which is not regulated by the Airport Land Use Plan. Portions of the pipeline would pass within the approach zone. This potential conflict with the plan is addressed in Mitigation Measure 3.1-1, a revised version of which is presented in Chapter 3, “Revisions to the Draft EIR”, of this final EIR. The final determination of whether the facilities conflict with the plan rests with the Airport Land Use Commission.
- I9-3. The Department of Transportation’s (DOT’s) Office of Pipeline Safety records do not contain information regarding incidents at compressor or separation facilities. No alternative sources for this information were identified. Injury and property damage data related to pipeline incidents is, however, available. From 1985 through the present there were 39 fatalities, 189 injuries, and \$238 million dollars worth of property damage related to the 1,302 reported transmission system incidents (DOT-OPS 1999).

It would be speculative to attempt to identify what the results of an accident at the proposed facility would, could, or might have on the environment. The state CEQA guidelines expressly caution against speculative analyses; however, because of the numerous permitted facilities throughout California and the nation, it can be reasonably assumed that the risk to the environment is acceptable to the regulatory agencies.

One could assume that since waste oil has been used in the past to suppress weed growth, that lubricating oil would have a detrimental effect on vineyards. The project Applicant has committed to carrying liability insurance or posting a bond to cover damages that may be caused by operations of their facilities. If an accident that caused property damage occurred, individuals could file a claim to seek reimbursement for losses.

- I9-4. The comment concerns the visual impacts associated with the proposed compressor in light of the scenic wine route being planned for the project area. The commenter notes that the scenic route would include Peltier Road. Under the proposed project, the compressor facility would be located east of Highway 99, adjacent to a frontage road approximately 1,400 feet north of Peltier Road. As discussed in Section 3.12, “Visual Resources”, of the draft EIR mitigation for the visual impacts of the compressor facility requires the development of a site design and landscape buffer to shield views of this facility from adjacent vantage points. The development of a site plan and the landscape buffer includes consideration of undergrounding a portion of this facility to reduce its visibility, creating a berm to shield this structure from view and to serve as a base for the landscape buffer and other measures used to minimize the visibility of the compressor. Additionally, the mitigation measure requires

the planting of landscaping prior to the construction of the facility and ongoing maintenance and monitoring of the landscaping to ensure that it effectively screens views of this facility from adjacent vantage points. Figure 3.12-2 depicts a photosimulation of the compressor facility with the implementation of the mitigation. Venting of the compressor facility, as discussed in Chapter 2, “Clarification of Major Issues”, of this final EIR, would occur infrequently and be of such short duration that the visual, odor, and noise effects of this activity would likely not detract from the scenic experience of the proposed wine route. Additionally, the preferred alternative for this project, as identified by the CPUC includes locating the compressor facility at the airport site, which would be at a greater distance from the proposed wine route along Peltier Road.

Letter I10

September 25, 1999

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

Re: Lodi Gas Storage Project

As a property owner directly affected by this project, I once again, strongly petition you to consider the effects this project will have on small family farms such as ours. We have 40 acres of choice vineyard which has to support myself and my family who manage it. If this project goes in, the pipeline will run the whole length of our property frontage, drastically affecting the value of our property, and will pose a constant danger to our home and family. Regardless of LGSP's reassurances to the contrary, that possibility is very REAL! We struggled to obtain this little bit of heaven for a long time, a safe place in which to raise our children and now our grandchildren. I have suffered two strokes since all of this started, and now am dependant on my children for not only my care, but for help in caring for my 84 year old mother who has Alzheimers. We don't need to have a constant fear of disaster looming over us. It really isn't right for a private business to come into an area and disrupt our whole liver and peace of mind, in order to line their pockets. And that is what this is all about! I can't even contemplate moving myself and my family to a safer location because I won't be able to sell my property for anywhere near what I have into it, or what it is worth today. No one wants to be that close to a possible disaster, let alone all the other detrimental effects the 16-108 Interconnect Station is going to impose on our area.

I10-1

I10-2

I have no means to fight this legally, so ask you to remember all of us when you make your decision. Our rights to a safe, clean environment, free from constant fear is at jeopardy. LGSP has gifted and well paid lawyers to tell you what you want to hear, but they cannot guarantee that a disaster will not occur, facts prove otherwise. Let them take this project to a remote area where there are no people whose lives and homes will be jeopardized.

Sincerely,

Charlene G. Evans

Charlene G. Evans, Trustee for
Ronald A. Evans Bypass Trust
P. O. Box 794, Lodi, CA 95241

5500 W. Acampo Road, Lodi, CA

209-339-8732

Responses to Comments from Charlene G. Evans

- I10-1. This comment concerns the potential change in property value resulting from the implementation of the proposed project or project alternatives. 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.
- I10-2. This comment concerns the safety of the pipeline in proximity to residences. Section 3.9, “Public Health and Safety” of the draft EIR, evaluates the potential risk to public safety from pipeline rupture that could lead to an explosion resulting in property damage or facilities. This 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.

Environmental impacts listed in CPUC's EIR draft with mitigation measures show "less than significant" impact. Perhaps the criteria used by CPUC differs from that of most of the people concerned.

How can we be certain our water will not be affected when the gas is being pumped in under such high pressure? Won't this cause geological changes over a period of time?

III-1

We would not be able to plant vineyard such as has been done in much of the surrounding land, if the pipeline is only 3 to 4 ft. deep. We will lose the use of approximately 1½ acres, valued at approximately \$10,000 to \$20,000 an acre.

III-2

Since natural gas has no odor, how can we be certain of no leaks at the storage field?

III-3

LGS's representative has given us different information at each contact, leading us to believe they may be a little unscrupulous. They are spending \$85,000,000 so they must stand to make a very large return on this project.

There must be other storage fields in the Rio Vista-Delta area. Why pump the gas 35 miles? The letter we just received from LGS enclosed the news article about the Wild Goose Project in Butte County--suggesting all would be well with the LGS project. How can they compare the Butte County Project, which runs about 5 miles through unpopulated area, with the proposed project?

III-4

We are considering selling our property. We are most certain the pipeline will devalue the property.

III-5

Please let LGS find an unpopulated area for their project.

If the project is approved, shouldn't we, as land owners on the same section of land and close proximity to the storage field, be compensated for the withdrawal of the gas already in the field?

III-6

Responses to Comments from Donald & Elfonda Filomeo

- I11-1. 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.
- I11-2. As noted on page 3.1-15 of the draft EIR (Mitigation Measure 3.1-2), within lands that are suitable for grape production but that have not been previously deep-ripped, the pipeline would be required to be buried at depth of 8 feet.
- I11-3. The comment concerns the potential for gas leaks at the storage field. Natural gas injected into the storage reservoir will be odorized. Routine inspections of the field transmission pipeline will be conducted to identify leaks in pipeline components and remedial actions will be taken within 1 month of inspection to repair any leaking components. Gas sniffers will be used during inspections to detect gas levels much lower than those detectable to the human nose.
- I11-4. There are other potential gas storage fields in the Delta region, however these storage areas are not as suitable as the Lodi Gas field for several reasons. These alternative sites are discussed starting on page 2-4 of the draft EIR. The draft EIR does not use the Wild Goose Storage project as a measure of potential impacts.
- I11-5. While a concern of the CPUC, property value is not typically an issue that is addressed in an EIR. Should the CPUC approve the project, the Applicant will be required to negotiate with individual landowners to acquire property. If the CPUC allows LGS to exercise eminent domain, and if property is acquired through eminent domain, the Applicant will be required to pay fair market value for any acquired property or easement. Such fair market value may include payment of reduction in property values.
- I11-6. Because mineral rights are owned separately from property, proximity to the storage field does not imply ownership interest in the natural gas held there. The CPUC does not regulate mineral rights and does not determine what property owners should receive compensation for mineral rights.



October 13, 1999
Lodi

Comments on the Draft EIR

NAME: Marc G

ADDRESS: 8078 ORCHARD RD
ACAMPO, CA. 95220

TELEPHONE (OPTIONAL): 209 369 1416

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-lo di@pamsf.com

COMMENT: I call this an invasion of our
privacy, with these alternatives, and
engineers nite - marc.

With many dollars over 60 million -
would it be better to sell your gas at
the original sight. Instead of
disrupting this peaceful territory.

As for the Oct. 13, 1999 meeting -
There was a lot of confusion - plenty
of Questions ask, and Very few answers.
As you may already know most persons
were disappointed and I rate,

Especially the acampo personnel.
With our homes and schools in the
vicinity - Your proposed compressor at
the Lind Airport sounds - unreal.

Please use the reverse side or attach any additional pages.

Safety factors should be realized
Home, schools, compressors etc. -

I & about 15 ~~QUESTIONS~~ persons, all this
against this.

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

in this area - along.



I12-1

I12-2

Responses to Comments from Marc G

- I12-1. The purposes of the proposed project are described in Section 1 of the draft EIR. The intent is to provide additional storage of natural gas for use when the state experiences significant shortages of gas.
- I12-2. 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. Land uses such as homes, schools, recreation areas, etc. are all considered in the design safety of the project facilities. Page 3.9-3 of the draft EIR describes the pipeline classes and the corresponding safety factors used in the design of the pipeline facilities.

Letter I13

3444 E. Jahant Rd.
Acampo, CA 95220
November 9, 1999

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

Dear Ms. Ikle,

Following are our comments on the draft EIR for the Lodi Gas Storage Project.

- 1. IS THIS PROJECT NECESSARY? We see nothing in the draft EIR that proves need. | I13-1
- 2. CONFLICT WITH AIRPORT USE PLAN. Regarding the proposed compressor facility site at Lind's Field / Lodi Airport: the draft EIR states on page 3.1-30 that "these conflicts with the adopted plan are considered significant." The proposed mitigation: "obtain determination that the project is consistent with or amend the airport use plan." This mitigation does not address the safety issues the county planners had in mind when formulating the plan; it merely brushes them aside. The proximity of the proposed compressor facility site to the airport with its ever-increasing air traffic and sky-dive activity is unsafe. | I13-2
- 3. AIR POLLUTION. We agree completely with Maureen Williams' able outline of the air pollution effects of the compressor facility. San Joaquin County air quality is poor already: the use of air pollution "credits" from elsewhere in the county does not compensate local residents for the emission of additional pollutants surrounding the proposed compressor facility. | I13-3
- 4. NOISE. The draft EIR appears to state the noise generated by the compressor facility would be about 40 decibels. This IS a significant increase, despite the assertion of the draft EIR to the contrary. | I13-4
- 5. ODOR. We do not find this addressed anywhere in the draft EIR. Odor is a significant effect, as anyone driving past the PG&E natural gas facility along State Highway 160 southeast of Rio Vista could testify. | I13-5
- 6. LIGHT POLLUTION. See the attached Associated Press article. | I13-6

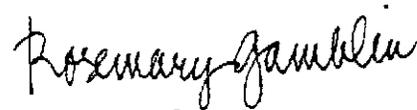
An alternative compressor facility location could be above the gas field. Residents in that area, although they would be affected by all the above types of pollution, would at least be compensated financially through payments for use of the field beneath their property. Those of us near the proposed sites at Highway 99 or Lodi Airport, but not on the pipeline or above the gas field, would receive only pollutants, a degraded quality of life, and reduced property values.

We urge the CPUC to vote for the "no pipeline" alternative.

Sincerely,

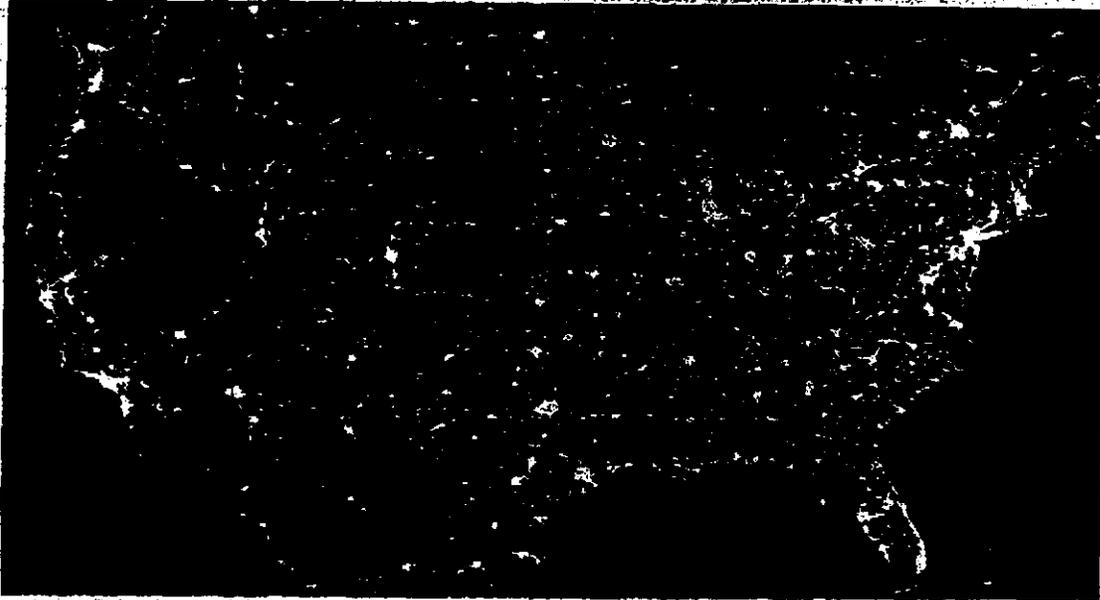


K. Douglas Gamblin



Rosemary Gamblin

LIGHT POLLUTION



A night view of lights across America is seen in this undated NOAA satellite photo.

Sky-gazers: For heaven's sake, let there be night

WASHINGTON (AP) — A cosmic question occurs to some people in far-flung lands, a common thought expressed in many tongues: Where has the night gone?

In the Middle East, Muslim clerics say it's difficult to find the faint sliver of the new crescent moon because of glare from the ground. In the Arctic, native elders say legends drawn from the winter sky are becoming harder to pass on because village lights obscure heavens inhabited by spectral caribou and departed souls.

From the Himalayas in India, retired geologist S.B. Misra thinks back on the Hindu star mythology he learned as a child and observes: "The clarity of the sky appears to vary from place to place and seems to have decreased with time in half a century."

Call it light trash. As development spreads, so, too, do lights of civilization. The dark frontier recedes.

"It creeps up on you gradually," says University of Virginia astronomer Phil Ianna, who some nights can see the city of Richmond's glow, 70 miles away, from his hilltop observatory.

Some sky-watchers worry the nightscape primeval is fading from sight. Leaders in a half-dozen states, scores of communities and groups internationally are acting to bring it back.

They are pushing for restrictions on light that shines wastefully into the sky, illuminating nothing but the bellies of birds, as they like to say.

The International Dark Sky Association draws astronomers and other stargazers together to fight celestial glare. For untold millions, it says, the "spectacular view of the night sky that our ancestors had on clear dark nights no longer exists."

Look up in an average suburb or city and on some evenings not much more than the moon, some planets and a smattering of the brightest stars might be visible. It's like watching a slide show in a lighted room, says David Crawford, president of the association.

Sources vary — it could be the distant glow of a 24-hour superstore playing on the clouds, a conglomeration of highway lamps erasing the stars, a neighbor's security light scattering its harsh rays, or all of that and more put together.

To be sure, vast reaches of the planet are still untainted by manmade light, even in the United States, a nation so developed its precise outline is visible in nighttime satellite photographs etched by the piercing lights of cities, suburbs and highways.

But light trash can intrude in unexpected places. Muslim clerics say modern lights and air pollution can make it hard to find the new moon that begins the holy month of Ramadan the next day.

Two hundred miles north of the Arctic Circle, in the Canadian town of Igloolik, pop. 1,200, researcher John MacDonald says local lights are getting in the way of legends of the Inuit, or Eskimos, who see stars of the Big Dipper as representing caribou.

"When I interview Inuit elders here, it's the first thing they point out, that they don't see the sky anymore because of the obscuring glare of the streetlights," said MacDonald, author of "The Arctic Sky: Inuit Astronomy, Star Lore and Legend."

"The anathema of amateur astronomers everywhere has hit remote parts of Canada," he said. "This affects the whole transmission of knowledge."

The International Astronomical Union plans to discuss light pollution at a United Nations-affiliated conference in Vienna, Austria, in July. Plainly, light pollution in space, this light that only pollutes the faint signals reaching us from the universe, it also represents the useless waste of much fossil or nuclear fuel, the union says.

In the United States, Maine has enacted glare controls, as have all Arizona counties and many cities from St. Augustine, Fla., to San Diego. Typically, regulations call for shielded highway lamps to keep light from scattering upward, require homeowners to direct security lamps to the ground or ban billboards illuminated from below.

Responses to Comments from K. Douglas and Rosemary Gamblin

- I13-1. The basic need for projects such as the Lodi Gas Storage Project is described in Section 1.2.1 on page 1-2 of the draft EIR. As discussed in this section, although pipeline capacity into California has more than tripled over the last 15 years, demand has risen even faster. On occasion, especially during cold spells, insufficient gas is available in the state to meet demands. This situation occurred in the winter of 1998-1999 for more than 10 days, which forced some fossil-fueled plants in the state to switch to fuel oil to fire the boilers resulting in increases in air pollutants. This concern has statewide effects and ramifications and has led to the deregulation of the gas storage industry to generally encourage additional gas storage within California.
- I13-2. Although the project facilities are located partially within areas under the jurisdiction of the Airport Land Use Commission, the compressor facility itself is on airport property, which is not regulated by the Airport Land Use Plan. Portions of the pipeline would pass within the approach zone. This potential conflict with the plan is addressed in Mitigation Measure 3.1-1, a revised version of which is presented in Chapter 3, "Revisions to the Draft EIR", of this final EIR. The final determination of whether the facilities conflict with the plan rests with the Airport Land Use Commission.
- I13-3. 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.

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.

As described in the last sentence of the sixth paragraph on page 3.5-4, there are no sulfur dioxide monitoring stations in the project area. The only sulfur dioxide monitoring stations within the San Joaquin Valley are located in the southern portion of the Valley and are primarily associated with oil and gas field operations. Currently, the entire state of California is in attainment for the California and federal sulfur dioxide ambient standards.

- I13-4. The noise analyses conducted for the draft EIR indicates that increases in noise levels at the nearest receptor would be barely perceptible, and more distant receptors would not experience any increases in noise levels. The project would comply with all applicable local noise regulations. Based on this information, the draft EIR concludes that the project would result in less-than-significant noise impacts.
- I13-5. 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”. 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.
- I13-6. The comment concerns nighttime lighting resulting from the proposed project. As discussed in Section 3.12, “Visual Resources”, the lighting proposed for aboveground facilities would be similar to those commonly used for farm or rural residential lighting. The lighting would include low-pressure sodium or similar low-glare lights (5 foot-candles) which would be shielded and directed downward away from traffic. With the exception of the compressor facility, the lights would only be illuminated when nighttime activities are necessary. Three light poles with low intensity lights (5 foot-candles) would illuminate the compressor facility at all times. Because the proposed lighting is similar to what is commonly used in the area, the project would not substantially alter nighttime views.



October 13, 1999
Lodi

Comments on the Draft EIR

20.15.99

NAME FRANCIS GIUSTO

ADDRESS: 4054 E. ACAMPO RD.

ACAMPO, CA. 95220

TELEPHONE (OPTIONAL): 369 4538 (209)

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-lo di@pamsf.com

COMMENT: SAFETY - NATURAL GAS ACCIDENTS CAN & DO HAPPEN. (MCDONALD ISLAND EXPLOSION & GIANTIC FIRE A WHILE BACK) COMPRESSOR LOCATED AT AN AIR FIELD (LIND AIRPORT) DOESN'T MAKE "SAFETY" SENSE.

AS FOR THE OCT. 13, 1999 - OVER 300 LOCAL PERSONS ATTENDED - MANY QUESTIONS ASKED, BUT VERY FEW ANSWERS - THERE WAS A LOT "BUCK" PASSING AND ONLY ONE MICROPHONE AVAILABLE. SOMETHING SMELLS FISHY, INCLUDING THIS - SO CALLED PIPE^{-LINE} AND FOR THE CHOSEN FEW. MOST OF THIS LOCAL GROUP ARE NOT IN FAVOR OF THIS PROJECT - IN OUR PEACEFUL SETTING.

Please use the reverse side or attach any additional pages.

1 of 2

- Francis Giusto -



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



I14-1

2

10.15.99
- CRUC -

TO WHOM IT MAY CONCERN :

PROJECT DISCRPTION - MENTIONS PRIVATE
 REAL ESTATE AGREEMENTS & LEASES -
 PRIMO FARM LANDS - ETC - SACTO. AND S.U.
 COUNTIES - LIGS TO CONTINUE - TO NEGOTIATE
 LEASE AND EASMENT AGREEMENTS -
 AGAIN, MAY MAKE MORE ADJUSTMENTS
 AND "ALTERNATES". HOW ABOUT OUR
 PROPERTY VALUES IN OUR AREA.
 WITH THE 3 AREA SCHOOLS - ANY
 EFFECT ON SAFETY FACTORS?

II4-2

II4-3

WHAT ARE OUR ADVANTAGES OF
 HAVING THESE PIPE LINES, COMPRESSORS,
 ETC NEAR OUR HOMES?

PLEASE CHECK YOUR BROCHURE ON
 SUMMARY OF ENVIROMENTAL IMPACTS
 & MITIGATIONS.

ITS EITHER "NONE REQUIRED" OR
 "LESS THAN SIGNIFICANT"

PRIVATE ENTERPRISE - YOU NEED
 MUCH-MORE "HOME WORK" ON THE
 SUBJECT.

EVERY THING IS MENTIONED
 EXCEPT - THE PEOPLE OF OUR
 COMMUNITY

Francis Justo
 209 - 369 4538

Responses to Comments from Francis Giusto

- I14-1. 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. Although problems or accidents at PG&E facilities may cause concern, they are not relevant to the operation of the proposed project. The project, if approved, will be built to the latest safety standards to minimize potential accidents.
- I14-2. While a concern of the CPUC, property value is not typically an issue that is addressed in an EIR. Should the CPUC approve the project, the Applicant will be required to negotiate with individual landowners to acquire property. If the CPUC allows LGS to exercise eminent domain, and if property is acquired through eminent domain, the Applicant will be required to pay fair market value for any acquired property or easement. Such fair market value may include payment of reduction in property values.
- I14-3. Land uses such as homes, schools, and recreation areas are all considered in the design safety of the project facilities. The U.S. Department of Transportation Office of Pipeline Safety; the State Fire Marshall; and other federal, state, and local agencies have established design construction, and operation requirements to ensure the safety of nearby residents. Page 3.9-3 of the draft EIR, for example, describes the pipeline classes and the corresponding safety factors used in the design of the pipeline facilities. Sensitive receptors such as homes and schools are also considered in evaluating noise and air quality effects of the project.

Letter I15

10-27-99

Can't help but put in my 2¢ worth -
it can't mean a thing but your
project is so very wrong.

Go put it in the hills where it
won't hurt our beautiful little
valley - we don't need you.

All in the name of progress - how
wrong you all are.

Marcella Gundert

*Mrs. Marcella Gundert
2145 W. Kettleman Lane
Apartment 324
Lodi, California 95242*

I15-1

Responses to Comments from Marcella Gundert

I15-1. The commenter requests that the project be located outside of the valley. Alternatives to the proposed project, including alternative locations were evaluated as part of the alternative screening process. This process and the location alternatives evaluated is described in Section 2.2, “Alternatives Screening Process” of the draft EIR. In addition to the Lodi gas fields in its Proponents’s Environmental Assessment, LGS claimed to have evaluated, 20 Northern California gas field. Only four were determined to have sufficient potential for development as gas storage fields. Although technically feasible, each of these fields were eliminated from further consideration because they either didn’t meet the project objectives or because they had the potential to result in greater noise and air quality impacts.

Letter I16

—Original Message—

From: Vivien Haynes [mailto:n3iviv@softcom.net]
Sent: Wednesday, October 13, 1999 9:31 AM
To: cpuc-gas-lodi@pamsf.com
Subject: Lodi Gas Storage Project

Having grown up on property that had a natural gas pipe line crossing it for more than 50 years, I have no objections to natural gas pipe lines. Is there any information available as to local individuals being share-holders in the the "Lodi Gas Storage Project". In other words, who locally will have financial gain from this project? Or who has already received financial gain, perhaps in the form of "finders fees"? Do you have this information? At an "information" meeting last night, this question was side-stepped several times. If you do not have this information available, can you direct me to someone that does? Having all the facts available to the people directly impacted would probably ease this project through more smoothly and perhaps keep the emotional turmoil down to a slow boil.

Thanks
Vivien Haynes

CC: Bonnie Nixon

I16-1

Responses to Comments from Vivien Haynes

I16-1. Lodi Gas Storage, LLC is a wholly owned subsidiary of Western Hub Properties, LLC. Western Hub Properties, a Texas-based company, is owned by two limited partnerships, Haddington Energy Partners, L.P. and Haddington/Chase Energy Partners L.P. Haddington Ventures, LLC is the managing partner of both limited partnerships. The two limited partnerships include affiliates of Indiana Energy, Citigroup/Travelers, Chase Manhattan Corps., and other individuals and entities. The CPUC is not aware of public information available pertaining to local individuals being shareholders in the affiliates or entities that own Lodi Gas Storage, LLC.