

PUBLIC SCOPING REPORT

SACRAMENTO NATURAL GAS STORAGE PROJECT
CPCN APPLICATION NO. 07-04-013

Lead Agency:

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1.0 OVERVIEW OF CEQA SCOPING PROCESS

1.1 Introduction

On April 9, 2007, Sacramento Natural Gas Storage, LLC (SNGS) filed an application (07-04-013) and a Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the Sacramento Natural Gas Storage Project. An addendum to the original PEA was submitted on October 9, 2007. In accordance with the California Environmental Quality Act (CEQA) of 1970, and the State CEQA Guidelines, the CPUC has decided that an Environmental Impact Report (EIR) will be prepared to evaluate the project in accordance with the criteria, standards and procedures of the CEQA (Public Resources Code Sections 21000 et. seq.) and the State CEQA Guidelines (California Administrative Code Sections 15000 et. seq.). The EIR will evaluate the proposed project and alternatives to the proposed project, including the No Project Alternative.

This Scoping Report documents the CPUC's CEQA scoping process and the comments received for the SNGS Project. Specifically, the Scoping Report describes the scoping activities, and documents the written and oral comments received on the SNGS Project Notice of Preparation (NOP) and at the CPUC's CEQA Scoping Meeting. The Scoping Report serves as an information source to the CPUC in its determination of the range of issues and alternatives to be addressed in the SNGS Project EIR.

1.2 Summary of CEQA Scoping Process

- The CEQA scoping process provides government agencies, public and private organizations and the general public the opportunity to identify environmental issues and alternatives for consideration in the EIR. The scoping process and results are an initial step in the CEQA process. The SNGS scoping process was initiated with the publication of the Notice of Preparation (NOP) on November 16, 2007. The NOP is included as *Appendix A-1*. The NOP and Public Notice were sent to 62 federal, state, and local agencies, 5 Native American Groups, 3 local libraries, as well as Yolo County, the City of Sacramento, and the County of Sacramento. The Public Notice was also sent to a total of 767 private individuals and organizations. During the NOP comment period, the CPUC held one public scoping meeting: December 6, 2007, Conference Center at Depot Park, 8215 Ferguson Street, Sacramento, CA.

The comment period for the NOP ended on December 17, 2007. In total, 9 letters were received and 6 individuals provided comments during the scoping meeting. These comments are incorporated into the EIR project record, and are documented and summarized in this Scoping Report.

The scoping meeting provided the public and government agencies the opportunity to receive information on the CEQA process and SNGS's proposed project and to provide oral and written comments. Approximately 24 persons attended the scoping meeting, including representatives from local and state agencies, organizations and private citizens.

Materials provided to the public at the CEQA scoping meetings are contained in *Appendix A* and include the following:

- *Appendix A-1* – Notice of Preparation
- *Appendix A-2* – Public Notice
- *Appendix A-3* – Scoping Material Handouts, including the Scoping Meeting Agendas, Power Point Presentation, and Scoping Comment forms.

1.3 Public Notification

Public notification for the SNGS Project and scoping meetings entailed a newspaper announcement and the mailing of the NOP and Public Notices. Notice for the public scoping meeting was published in the Sacramento Bee on November 16, 2007. Concurrent with the distribution of the NOP, Public Notices regarding the project and CEQA scoping process were distributed. *Appendix A-2* contains the Public Notice.

The NOP was also made available to the public on the CPUC's environmental website for the SNGS Project at: http://www.cpuc.ca.gov/environment/info/dudek/sngs/SNGS_Home.htm.

1.4 Agencies, Organizations and Persons Providing Scoping Comments

Written comments were received during the CEQA scoping process from federal, state and local agencies, private and public organizations, and the general public. Written comments provided in response to the NOP are included in *Appendix C-1* of the Scoping Report. Written comments provided during the scoping meeting are provided in *Appendix C-2* of the Scoping Report. Individuals that commented during the scoping meeting are listed below. Speaker registration cards are provided in *Appendix B-1*.

In summary, the following agencies, organizations and private citizens provided input during the CEQA scoping process:

LETTERS

State Agencies

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit,
11/19/07

California Department of Conservation, Division of Oil, Gas and Geothermal Resources,
11/29/07

California Department of Transportation, District 3 – Sacramento Area Office, 12/12/07

Local Agencies and Planning Groups

City of Sacramento, Fire Department, 11/26/07

City of Sacramento, Development Services Department, 12/17/07

County of Sacramento, Department of Transportation, 11/27/07

City of West Sacramento, Redevelopment Agency and Department of Parks and
Recreation, 12/14/07

Public and Private Organizations

Pacific Gas & Electric, 11/19/07

Remy, Thomas, Moose and Manley, LLP, 12/17/07

SCOPING MEETING COMMENTORS – 12/6/07

Tom Buford, City of Sacramento

Kevin McCarty, City of Sacramento, Councilmember District 6

Robert Habel, Division of Oil, Gas, and Geothermal Resources

Chris Butcher, Remy, Thomas, Moose & Manley

Constance Slider, Avondale Glen-Elder Neighborhood (AGENA)

Diana Portillo, Colonial Manor Neighborhood Association

The input received during the CEQA scoping process will assist the CPUC in identifying the environmental issues and range of alternatives to be addressed in the EIR. All issues raised in the scoping process will be reviewed by the CPUC to determine the appropriate level of analysis and consideration.

1.5 Organization of Scoping Report

Summary information on SNGS's stated project objectives and the SNGS Project description is presented in *Section 2.0* and provides background information regarding the applicant's proposed project. The results of the EIR Scoping Process are subsequently summarized in *Section 3.0*. *Appendix A* includes notification and scoping meeting materials, *Appendix B* provides a record of attendees at the public scoping meeting, and *Appendix C* provides both Notice of Preparation comment letters and written comments submitted at the scoping meeting.

2.0 SUMMARY OF SNGS'S PROPOSED PROJECT

2.1 SNGS's Stated Project Objectives

SNGS's PEA lists the following basic objectives for the Sacramento Natural Gas Storage Project:

1. Increase In-State Natural Gas Storage Capacity

In their Energy Action Plan II adopted in October 2005, the CPUC and the California Energy Commission recognized a continuing statewide need for natural gas storage projects to assist in enhancing natural gas supply reliability and mitigating natural gas price volatility. They listed among their recommendations for "KEY ACTIONS" the objective of promoting new natural gas storage projects. The proposed project responds to this continuing need, and will provide statewide benefits in expanding the existing natural gas supply infrastructure in California.

2. Utilize an Existing Natural Gas Storage Field

Three types of natural gas storage facilities are currently in use in the United States: abandoned salt caverns, water aquifers, and old production fields. In California, only old production fields are currently used as storage facilities. An old, pressurized production field is considered the most desirable by storage facility developers for several reasons: because the field was already used for gas production, the geology of the reservoir is generally well-known, and the cap rock covering the permeable basin holds natural gas in very well, while water below keeps it pressurized for easier withdrawal.

2.2 Summary of SNGS's Proposed Project

The proposed project consists of the construction and operation of a natural gas storage facility, the Florin Gas Field. Proposed project components would be located within the City of Sacramento, the City of West Sacramento, the County of Sacramento, and Yolo County. The proposed project includes the underground natural gas storage reservoir; a wellhead site; a compressor station; a buried 16-inch interconnection pipeline between the wellhead and compressor site; a buried 16-inch interconnection pipeline between the compressor site and Sacramento Municipal Utilities District (SMUD) Line 700; and the Yolo County interconnection consisting of a buried 12-inch interconnection pipeline between SMUD Line 700 and PG&E Line 172 and associated metering facilities.

The proposed project would store natural gas in the depleted Florin Gas Field reservoir, which is situated approximately 3,800 feet below the ground surface. Natural gas was previously extracted from the Florin Gas Field by Proctor and Gamble, Vendada national, TXO Production

Corporation, and Union Oil Company until approximately 1987 when the natural gas production was depleted. At that time, the wells and appurtenance facilities were capped and abandoned in accordance with regulations set forth by the Division of Oil, Gas and Geothermal Resources (DOGGR). Currently, there is no natural gas injection or extraction equipment at any of the proposed project sites.

The natural gas field is centered at the corner of Power Inn Road and 53rd Avenue in the City of Sacramento. About three-fourths of the field is in the City of Sacramento, and one quarter is in Sacramento County. The wellhead site, compressor station and associated interconnecting pipelines would be situated within the City of Sacramento. The wellhead site would be located at the northeast corner of the intersection of Junipero Street and Power Inn Road, the compressor station would be located north of the wellhead site on the historic Sacramento Army Depot that is Depot Park. The Yolo County Interconnection would be located partially within the City of West Sacramento and partially within Yolo County.

3.0 SUMMARY OF CEQA SCOPING COMMENTS

Section 3.0 summarizes the scoping comments received from federal, state and local agencies, local planning groups, private and public organizations, and the general public. Comments are organized by issue area. Within each issue area, written comments provided on the NOP by agencies and organizations are summarized first, followed by additional comments provided during the scoping meeting. Verbal comments presented during the scoping meeting are incorporated below as well. Reference should be made to *Appendix C* for full copies of NOP comment letters and written comments provided during the scoping meeting.

3.1 EIR Administration and Project Procedures

LETTERS

State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, Sacramento, CA – letter, 11/29/07

- The DOC comments that the project applicant must consult with the Division of Oil, Gas, and Geothermal Resources in order to implement construction and operation activities associated with the proposed project. Written approval from the State Oil and Gas Supervisor (Supervisor) is required prior to changing the physical condition of any well.
- The Division must be notified to witness or inspect all operations as specified in a notice of intent of well operation. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, well-plugging operations, and annual tests/surveys.
- The well operator must have a bond on file with the Division before certain well operations are allowed to begin.
- The well operator must designate an agent, residing in the State, to receive and accept service of all orders, notices, and processes of the Supervisor or any court of law.
- The DOC requests to be added to the list of agency contacts for the proposed project.

California Department of Transportation, District 3 – Sacramento Area Office, CA – letter, 12/12/07

- Caltrans provides a contact for encroachment permit assistance.

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The City reserves the right to submit addition comments on the scope of the EIR given that the application is not yet deemed complete per the CPUC.
- The City of Sacramento Zoning Code requires approval of a Special Permit for the construction or operation of oil or gas wells.

- The project will require City approval for construction.
- The SNGS EIR should reference the Depot Re-Use project EIR.
- The CPUC has determined that they are the Lead Agency under CEQA and has identified the City of Sacramento as a Responsible Agency. The City has expressed concern with this determination and requested an agreement to provide for a cooperative effort as co-lead agencies. The City believes it is appropriate to have more involvement in processing of the EIR than granted to responsible agencies.
- It is the City's practices to receive and review the Draft and Final EIR and communicate with the Lead Agency throughout the EIR process.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- Remy, Thomas, Moose and Manley request inclusion on CPUCs mailing list to receive copies of all public notices pertaining to the proposed project.

SCOPING MEETING COMMENTS – 12/6/07

Avondale Glen Elder Neighborhood Association (AGENA), City of Sacramento, CA - Constance Slider

- AGENA requests an attendance sheet from the public scoping meeting on December 6, 2007 as well as a transcript of the meeting.

3.2 Project Objectives

SCOPING MEETING COMMENTS – 12/6/07

State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, Sacramento, CA – Robert Habel

- The DOC acknowledges that the demand for natural gas in the State of California is greater than supply into the foreseeable future and the proposed project is a necessity.

City of Sacramento, Sacramento, CA- Kevin McCarty

- The city is concerned that the project is not necessary for the city or for either utility.

3.3 Project Description

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The City requests a description or footprint of the compressor station and wellhead facilities. Additional entitlements may be required depending on facility details such as height.
- The City encourages cooperation with CPUC to adequately describe project components and operations.

- The EIR should include a clear explanation of the regulation and enforcement responsibilities of the agencies involved including, but not limited to, the following: PUC, including authority exercised pursuant to state authority and federal delegation; Department of Conservation, Division of Oil, Gas and Geothermal Regulation; City of Sacramento; City of West Sacramento; County of Sacramento; and County of Yolo. The EIR should discuss the manner in which the responsibility of the agencies may overlap.
- The EIR should include a description of the reservoir including geology of the relevant area.
- The Regional Map should show the extent of the storage field area, approximate locations of the pipelines and river crossings, and jurisdictional boundaries.
- The EIR should include a description of the pipelines, including location and depth, and the compressor station and wellhead facilities. The footprint of all facilities should be depicted.
- The project description should fully describe gas storage and all pipelines. The pipelines should be analyzed for permanent impacts regarding emergency response and public safety. Depth of pipelines, number and size of wells, compressor station components, and operation of these facilities needs discussing.
- The construction start date needs revision.

City of West Sacramento, Redevelopment Agency and Department of Parks and Recreation, CA – letter, 12/14/07

- The City of West Sacramento notes that the project as sited will not fit within the boundaries of the city owned parcel; however, there may be alternative locations for the facility within the parcel. Any site selection should be large enough and property configured to accommodate the proposed facility and not interfere with other uses on the parcel.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The project description must include a detailed map with the precise location and boundaries of the proposed project, as well as a regional map showing the location of the project. The map should illustrate the location of the underground storage facility in relationship to the residential properties and nearby schools.
- Remy, Thomas, Moose and Manley request that the properties included in the project area are keyed to an appendix that lists the property owners names and addresses.
- The project description should describe all infrastructure requirements.

3.4 Human Environment Issues

3.4.1 General

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- Construction impacts and staging areas associated with construction should be addressed and analyzed.
- The EIR should include a discussion of ownership rights regarding the natural gas stored under a property.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The issuance of the NOP generally defines the date for the environmental baseline.
- The CPUC must conduct air quality, geology and soil, hydrology and water quality, and transportation studies based on the current baseline for analyzing impacts as defined by the NOP.
- The executive summary and the Draft EIR must identify AGENA’s concerns regarding hazardous materials, water quality, geology and soil, health and safety, land use and planning, and non-urban alternative project locations as “areas of controversy” as well as mitigation measures to reduce significant impacts.
- The CPUC must make necessary CEQA findings and modify the project where feasible to lessen or avoid significant impacts.
- Remy, Thomas, Moose and Manley believes mitigation measures will not reduce the potentially significant environmental impacts to a less than significant level.
- Proposed mitigation measures should address potential accidents and secondary impacts, need to include monitoring plans with funding mechanisms in place, should provide for third-party oversight, and should continue for an appropriate period of time after operations terminate at the facility.

3.4.2 Public Safety/Hazards and Hazardous Materials

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- Potential gas migration should be analyzed in this section.
- A Threat Assessment should be prepared in order to analyze the potential for increased terrorist threats associated with the project.
- Potential public health impacts associated with utility conflicts should be analyzed.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The Project cannot be made safe and will have potentially significant unavoidable impacts at the currently proposed facility location, which exacerbates the risk and severity of potential accidents.
- The history of accidents at natural gas storage facilities including 200 deaths from natural gas pipeline accidents presents a significant environmental impact. Irreversible damage can result for environmental accidents associated with the project.
- The EIR should analyze the chemical makeup of all substance added to the natural gas.
- Mitigation measures should reduce the number of hazardous materials handled at the project facilities and should establish monitoring programs.
- The EIR must evaluate the impacts of the proposed project on nearby schools.
- An emergency response plan should be established and should include a fund to cover costs of damage to property and life.
- Mitigation measures must be established to address gas migration and other gas or chemical leaks caused by geologic conditions in the project area.

SCOPING MEETING COMMENTS -12/6/07

City of Sacramento, Sacramento, CA – Kevin McCarty

- The city is concerned that the risks faced by the residents greatly exceed the benefits to the gas company. Risks of concern include the following:
 - Underground gas storage facilities have demonstrated a history of gas migration problems.
 - Gas storage facilities pose a risk of explosion and fire, especially when located in an urban setting.
 - Gas storage within natural geologic formations does not take into consideration fracture zones and imperfections in the earths geologic layers that result in gas migration toward the surface.
 - There is no way to assure that there will be no vertical gas migration to the surface.
 - Noxious odors and emissions of carcinogenic chemicals with gas storage operations.
- The applicant has not proven that the neighborhood is safe.
- The City requests completion of a Health Risk Assessment.
- The City requests a review of the safety and security issues posted to residents of the community.

- The City requests a thorough exploration of gas migration issues.

Avondale Glen Elder Neighborhood Association (AGENA), City of Sacramento, CA – Constance Slider

- AGENA requests the disclosure and enforcement of protective measures to ensure public safety for the residences impacted by the proposed project.
- AGENA would like to know the capacity and specific role of the fire department, Building & Safety Department, CPUC, and all responsible agencies that deal with safety enforcement.
- AGENA requests that gas migration away from the wellhead should be evaluated for safety considerations.
- AGENA requests an examination of the existing chemicals in the soil now and how the existing soils will react with natural gas.
- AGENA requests an explanation of the worst-case scenario and who would be liable.
- AGENA requests an explanation of the current testing standards and states an early warning system for pipeline corrosion is needed.

Colonial Manor Neighborhood Association, City of Sacramento, CA – Diana Portillo

- Colonial Manor Neighborhood Association requests justification as to the location of the facilities given there is so much open space going east past Florin/Perkins.

3.4.3 Land Use/Planning

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The Land Use/Planning Section should address impacts to Sacramento and Yolo Counties.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- Conflicts with existing local and regional plans should be evaluated in the EIR.
- The CPUC should consider how the proposed project may impact residential property values. Impacts on property values may cause urban decay and blight.
- Mitigation measures should be incorporated to address land use impacts.

SCOPING MEETING COMMENTS – 12/6/07

City of Sacramento, Sacramento, CA – Kevin McCarty

- The City requests a review of the economic issues as they relate to property values.
- The City requests adherence to CPUC policies and directives to take environmental justice issues into consideration given the demographics of the neighborhood.

3.4.4 Traffic and Transportation

LETTERS

County of Sacramento, Department of Transportation, Sacramento, California – 11/27/07

- The County of Sacramento requests the EIR address the potential impacts to any roadways in Sacramento County that are caused by the proposed project and identify necessary mitigation measures. The analysis should address both construction and operation phases.

California Department of Transportation, District 3 – Sacramento Area Office, CA – letter, 12/12/07

- Pipeline construction near Interstate 80 may need a Transportation Management plan depending on impacts to the highway. The project must clarify any interconnecting pipelines or associated facilities to be buried within the highway right of way.
- Caltrans notes the project component located adjacent to the junction of West Capital Avenue/Enterprise and the westbound on-ramp to Interstate 80 could have significant impacts to this ramp. The adjacent bicycle trail could also be significantly impacted. The bicycle trail is relatively heavily used and must be kept open or a detour route provided during construction. Caltrans requests further detail about planned construction at this location and potential mitigation plans.
- Caltrans provides a copy of their Transportation Management Plan Guidelines.

3.4.5 Air Quality

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The air quality section should include an analysis of climate change, specifically as it relates to the methane gas associated with the project.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- AGENA encourages use of alternative fuel construction equipment and a dust control plan.
- An air quality study should be conducted to establish an accurate description of existing conditions current as of publication of the NOP.
- Monitoring programs must be established to guard against natural gas migration, leak or emission of noxious odors, and leak of carcinogenic chemical from the project.

3.4.6 Biological Resources

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- Frac-out and sedimentation should be addressed in the Biological Resources section in order to analyze temporary impacts to special status species.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- A biological resources study should be conducted to establish accurate description of existing conditions current as of publication of the NOP.
- The biological resources study should include an ecological analysis of the subsurface plant, fungi, and animal life in the project area.
- Impacts of the proposed project on biological resources on and off-site should be evaluated.

3.4.7 Cultural Resources

LETTERS

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- AGENA encourages CPUC to coordinate with the Native American Heritage Commission and include mitigation to reduce potential impacts.
- The EIR should address a plan for recover in event of cultural resources discovery during construction activities.
- The Army Depot is a historically significant site and the EIR must analyze impact to he Army Depot accordingly.

3.4.8 Geology and Soils

LETTERS

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- A geology and soils study should be conducted to establish accurate description of existing conditions current as of publication of the NOP.
- An evaluation of impacts of the project on unique geological features should be performed.

3.4.9 Hydrology and Water Quality

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- Frac-out and sedimentation should be addressed in the Hydrology and Water Quality section in order to analyze temporary impacts to special status species.

- Potential gas migration should be analyzed in this section.
- The project will be required to comply with all water quality requirements.
- The analysis should address changes to drainage patterns and base flood elevation in the area.

City of West Sacramento, Redevelopment Agency and Department of Parks and Recreation , CA – letter, 12/14/07

- The EIR should evaluate any effects upon levee maintenance or flood control activities that might be caused by the location or presence of the proposed project

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- A hydrology and water quality study should be conducted to establish accurate description of existing conditions current as of publication of the NOP. Secondary impacts on biological resources and human health must be considered in the EIR.
- A monitoring program should be established to monitor the project's impacts on ground water.

3.4.10 Public Services/Recreation/Utilities

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The need for additional emergency response services should be coordinated through the City and County and addressed in the EIR. The analysis should include an effective Emergency Action Plan, equipment, and training.
- The EIR should examine the additional risk of explosion and fire associated with the proposed project.
- A water study including existing water flows in the area should be completed in consultation with the City Department of Utilities.
- Potential impacts to park facilities should b addressed.

City of West Sacramento, Redevelopment Agency and Department of Parks and Recreation , CA – letter, 12/14/07

- The proposed project may adversely impact access to the existing Kinder-Morgan and Wickland Oil facilities.
- The EIR should evaluate the effects of the proposed project on the bike path as well as access to other uses of the city's property.
- The EIR should detail site restoration and potential improvements that will mitigate aesthetic or recreational impacts as a result of the proposed project.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The Draft EIR must evaluate project impacts on fire and water services and impact in event of an accident.

Pacific Gas & Electric, Sacramento, California – letter, 11/19/07

- PG&E requests that the proposed project evaluate any conflicts with existing PG&E gas and/or electric facilities and incorporate these facilities on proposed plans. PG&E notes an application for Gas Service is required for the proposed project.
- Contacts are provided in event of land use conflicts, construction equipment weight limits, and conflicts with existing facilities or new service to the project site.

3.4.11 Noise

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- Drilling for well installation should be addressed in the noise analysis.

3.5 Alternatives

LETTERS

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The alternative analysis will be one of the most important sections of the Draft EIR.
 - A non-urban underground natural gas storage facility site location should be chosen, in part due to the unavoidable safety concerns associated with operating an underground natural gas storage facility in an urban setting.
 - The Draft EIR must include an equal level of analysis for alternative of an off-site underground storage alternative including a non-urban underground storage location.

SCOPING MEETING COMMENTS – 12/6/07

City of Sacramento, Sacramento, CA – Kevin McCarty

- The City requests the applicant move the project to an alternative non-residential site (i.e. industrial or commercial area).
- The City requests a comprehensive evaluation of non-residential sites including the no-project alternative.

3.6 Cumulative Impacts

LETTERS

City of Sacramento, Development Services Department, Sacramento, CA – letter, 12/17/07

- The EIR should consider the water pipeline project and an ethanol plant proposed at the Depot Park site in the cumulative analysis.

Remy, Thomas, Moose and Manley, LLP, Sacramento, CA – letter, 12/17/07

- The proposed project will result in both individually significant and cumulative impacts and requires “a mandatory finding of significance.”