

**APPENDIX A. NOTICE OF PREPARATION
AND KEY ISSUES**

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 17, 1999

Notice of Preparation (NOP)

Environmental Impact Report for the Proposed Development of the Lodi Gas Storage Project by Lodi Gas Storage, LLC Application No. 98-11-012

Project Description

On November 5, 1998, Lodi Gas Storage (LGS), LLC, a wholly owned subsidiary of Western Hub Properties, LLC, filed an application (Application No. 98-11-012) with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN). The application requested authorization to develop, construct, and operate an underground natural gas storage facility and an ancillary pipeline and to provide firm and interruptible natural gas storage services at market-based rates. LGS was formed by Houston-based Haddington Ventures in 1998 to develop natural gas facilities.

LGS proposes to develop an underground gas storage facility using a previously operational natural gas production field on approximately 1,450 acres northeast of Lodi, California, in San Joaquin County. The proposed project includes the construction of several gas injection and withdrawal wells, a field collection and water separation facility, a remote gas dehydration and compression facility, and approximately 31 miles of pipeline. The pipeline would interconnect first with Pacific Gas & Electric's (PG&E's) Line 196 at the Las Vinas Station in San Joaquin County and ultimately terminate at the PG&E Line 401 on Sherman Island in Sacramento County. The field is located approximately three miles east of US Highway 99 and approximately 5.4 miles northeast of the City of Lodi. The intersection of Jahant and Bruella Roads marks the approximate center of the field. According to the applicant, the Lodi Gas Storage Project (project) would accommodate an inventory of 12 billion cubic feet (Bcf) of working gas, with a maximum firm delivery (withdrawal) rate of 400 million cubic feet per day (MMcf/d), a maximum firm injection capability of 400 MMcf/d, and the capability of injecting and withdrawing gas several times within a day.

Amerada Hess discovered the former Lodi Gas Field in 1943. Gas production began in 1946 and continued until 1972 when the field was abandoned because of water incursion into the producing fields. A total of six production wells were subsequently capped and properly abandoned. Total production from the field through its 25-year life was approximately 23.2 Bcf. The field consists of two reservoirs bounded by shale caprock layers that, according to the applicant, appear to be impermeable, which is a condition necessary for suitable storage projects.

Environmental Effects

Because the project involves routing the pipeline under certain waterways, railroads, roads, and highways, as well as installing a gas-fired compressor station, its development may involve potentially significant environmental effects. The compressor station could affect the environment primarily through air emissions from the combustion of natural gas in the piston-type compressor, as well as through noise impacts from compressor operation. Construction of the pipeline may result in impacts on sensitive wetlands, as well as other riparian habitat. Pipeline construction could also affect the structural integrity of the levees bordering the waterways under which the pipeline would run. Following the guidelines of the California Environmental Quality Act (CEQA), the CPUC intends to prepare an Environmental Impact Report (EIR) to assess the potential impacts on the environment caused by the project.

The EIR will examine all potential impacts on the environment caused by the project and possible mitigation measures to reduce or eliminate those impacts as related to issue areas specified in CEQA. These include:

- **Land use and planning**, to assess the potential impact on zoning and other local jurisdiction planning guidelines
- **Population and housing**, to examine the potential effect of project-related employment on local and regional housing and growth
- **Geology**, to assess the potential impact from drilling activities, especially the integrity of subterranean rock and soil layers under waterways and highways and the potential for future damage from earthquakes, soil erosion, land subsidence, and expansive soils
- **Hydrology**, to assess the potential impact from drilling and other activities on local surface and groundwater resources
- **Air quality**, to assess whether the local population would be exposed to construction- or operations-related pollutants, and to ensure the applicant employs technology to minimize air emissions and also takes other action, coordinated with the San Joaquin Unified Air Pollution Control District, to compensate for (offset) all new emissions created by the project
- **Transportation and circulation**, to assess how project construction and operation will affect local traffic patterns, including construction-related congestion and emergency vehicle access
- **Biological resources**, to ensure local animal and plant populations and habitat – especially wetlands habitat and threatened, endangered or rare aquatic species

near the waterway crossings – are not negatively affected by construction or operation of the project

- **Energy and mineral resources**, to assess potential impact on nonrenewable natural resources
- **Hazards**, to examine potential use and handling of hazardous materials in construction and operation of the project, assess the threat if release of hazardous materials, and assess the potential for creating a health hazard
- **Noise**, to assess potential impact on sensitive receptors (i.e., people who live or work near the project) caused by project-related noise, such as from construction machinery or the compressor station
- **Public services**, to assess potential impact on local police, fire-fighting, school and other services provided by local agencies
- **Utilities and services systems**, to examine the effects of project-related demand on local infrastructure, including electric, natural gas, water, and telecommunications systems
- **Aesthetics**, to ensure the project does not result in unsightly impacts on the local landscape
- **Cultural resources**, to ensure project construction and operation does not result in negative impacts on archeological and paleontological resources, both known and unknown (e.g., if construction of the project uncovers signs of ancient cultures)
- **Recreation**, to assess potential impacts from the project on local recreational activities, such as sportfishing in local waterways

The EIR will address both project and cumulative effects to assess total potential impacts of the project in combination with other present and planned projects in the area. The EIR will also contain an analysis of alternatives to the proposed project, such as locating the project along other routes, that would accomplish the project objectives. The EIR will assess the environmentally preferred alternative.

To reduce potential environmental impacts, potential mitigation measures that could be studied as part of the EIR and mandated as conditions of project approval include:

- using directional drilling for routing the pipeline under certain waterways, roads, and highways
- avoiding sensitive habitats and areas
- constructing the compressor station at a remote site to reduce potential noise impact in the rural setting
- using noise-attenuating materials during drilling, construction, and operation
- locating structures near existing roadways to minimize the need for new access roads
- re-vegetating rights-of-way for agricultural and habitat purposes
- scheduling construction to reduce impacts to sensitive receptors, agricultural practices, and wildlife
- using vegetative screening to reduce potential visual impacts
- re-injecting produced water to reduce potential groundwater impacts

- complying with applicable regulatory requirements during construction and operation

This Notice of Preparation was sent to interested state, local, and federal agencies and to the California State Clearinghouse. Agencies should identify the issues, within their statutory responsibilities, that should be considered in the EIR. The general public is also invited to submit comments on the scope of the Draft EIR at or before March 9, 1999.

Send written comments on the scope of the EIR to:

Judith Iklé
CPUC Lodi Project Manager
C/O Jones and Stokes Associates
2600 V Street, Sacramento, CA 95818

Messages for Ms. Iklé may be left at (415) 989-1446 ext. 85. Her fax number is (415) 291-8943. E-mail communications are encouraged; e-mail messages should be sent to: dbolland@JSAnet.com, subject - CPUC Lodi Project Mgr/Judith Iklé. Information about this application will be posted on the Internet at <http://www.cpuc.ca.gov/divisions/energy/environmental/info/lodi-gas.htm>

The CPUC will also conduct two public meetings on March 8 and 9, 1999, in the project area to present information and gather comments from the general public on the scope of the EIR. The CPUC also intends to hold two rounds of meetings with local, regional, state, and federal agencies that have an interest in, responsibility for, or knowledge of the project area. Following the release of the Draft EIR, the CPUC will conduct at least one public meeting to present the Draft EIR and to receive public comment on the document. The public and agencies will also have 45 days during which to review and submit written comments on the Draft EIR. The CPUC will then respond to the comments as part of producing the Final EIR.

The applicant has proposed mitigation in its Proponent's Environmental Assessment (PEA) that it believes will mitigate any potentially significant environmental impacts of the project. The applicant's PEA is available for review at the CPUC, Central Files – Room 2002, 505 Van Ness Avenue, San Francisco, 8 a.m. – 5 p.m. Please contact Central Files at tel: 415-703-1661 (refer to Application 98-11-012) to view the PEA document.

The California Public Utilities Commission hereby issues this Notice of Preparation of an EIR.

Natalie Walsh
Branch Chief
Energy Division

Lodi Gas Storage Project

Key Issues

1. Project Description

Pipeline and the Route

Physical Parameters – Describe the physical characteristics of the pipeline (length, width), its safety features, and explain the right-of-way needs (30-foot), both short- and long-term.

Proposed Route – The CPUC should describe and evaluate the criteria developed to select the proposed route more clearly (including parcel numbers), including the factors that defined the proposed route (pipeline corners, wetland issues, orientation (E-W versus N-S) and trees) and how the applicant considers micro-adjustments of the route. Date maps that depict proposed routes so public can ascertain most current configuration.

Alternate Routes – The CPUC should consider and present alternative pipeline routes, including an alternative that examines the use of the public right-of-way (roadways and existing utility corridors, e.g., WAPA lines), the Delta alternative, or the area south of Armstrong and north of Eight Mile Road. Discussion of alternative routes should include alternate connections to Line 401 (south along I-5 or west along Route 12), and the avoidance of preserves and natural areas.

Route Signage – Clarify responsibilities for placing and maintaining the pipeline signage.

Route Access – Clarify the anticipated access to the pipeline route for maintenance or for construction of additional pipelines. Review the PG&E easement practices to identify the potential landowner concerns and constraints on farming activities.

Compressor Facility

Compressor Location – Consider alternate locations for the compressor facility. The compressor should be located in an area zoned for industrial use. Can the compressor be located nearer the storage field? In the highway interchange? In Lodi? Near I-5? How will locating facility in currently proposed location enable similar such facilities to locate in the same area?

Wells

Former Wells – Identify the locations, and describe the closure of the former wells. Consider the safety of those abandoned wells.

Locations – Identify well locations, describe their size, and potential impacts.

Regulatory Oversight – DOGGR monitors well construction and requires monthly reporting on injections and withdrawals. Applicant must post a bond for well drilling before drilling wells. Disposal wells must be tested annually (DOGGR).

Operation – Explain the use of the injection wells, and potential hazards such as collapse of the wells. Will the same site be used for extraction and injection?

PG&E Transmission Capacity

Transmission Capacity – Clarify that PG&E has capacity to handle the gas transmissions, including assurances about future capacity.

Construction

Construction Phasing – Describe the expected needs for surveys and inspections, expected length of construction, disruptions to traffic and circulation, and the planned construction

phasing. Avoid construction during important agricultural activities; consider the influence of seasonal weather variations on those activities (i.e., late summer, early fall harvests). Do not plan construction around fields that have not yet been harvested without seven-day notice of intent to install pipeline and consent of the grower. Repair severed cordon wires to the satisfaction of the growers.

Directional/Slant Drilling – Explain this process for drilling pipeline beneath roadways and waterways, why this was chosen, and how the integrity of the pipe will be assured.

Stockpiles/Construction Staging – Consider needs and extent of temporary stockpiles or storage for pipeline or other stored materials.

Pipeline Operation

Describe the pressures expected in the pipeline, the capacity and any potential increases, and the monitoring, inspection and maintenance schedules. Describe the direction in which the gas will flow, and identify any other facilities or storage locations to which gas conveyed in this project may be sent. Identify the beneficiaries, describe the service area to which the gas would be available (only PG&E?). Public concerned that they will suffer only impacts and reap no benefits (i.e., natural gas service) from the construction and operation of the project.

Abandonment

Transfer or Sale – Describe the process and contingencies should ownership of the pipeline and/ or the facilities change.

Pipeline – Describe the procedures and requirements for abandoning the pipeline. Will the pipeline remain in place? Who is responsible for maintaining the integrity of or removing the pipe? Identify the needs for performance bonds or other financial vehicles to ensure resources to respond to maintenance.

Underwater Crossings – Describe the abandonment of underwater crossings (sealing the pipe).

Wells – According to DOGGR, well abandonment requires that they are sealed and cut off down to 5 feet. Describe the potential impacts from the presence of capped wells.

2. Environmental Impact Issues

Safety

General Safety Requirements – Describe the governing safety regulations, including gas odorizing and safety measures between the well field and the odorizing facility. Consider safety of storage tanks and sufficiency of containment berms.

Pipeline – Evaluate the safe depth and distance from residences of the pipeline and safety measures to prevent disruption of the pipe. PG&E's safety experience on MacDonald Island could provide some valuable lessons for this project. Describe the pipeline pressure and comparison to other pipelines in the area.

Emergency Response Procedures – Describe public notification, response procedures in the event of an explosion, including the proximity and capacity of local fire stations. Consult with County and local fire districts about emergency response plans and procedures, capabilities, and training. Fire Mutual Aid fees are determined by the quantities of hazardous materials (determine if the fee is also based on quantities of natural gas). Have the costs of downwind damage from a release been estimated?

Airport Safety – Consider airport safety and the proximity and height of the compressor facility.

Catastrophic Event – Describe the facilities’ ability to withstand a major catastrophic event (earthquake, dam failure, flood, levee failure, peat fire, terrorism).

Safety During Construction – Consider the potential for construction activities to spark a peat fire on the Delta islands. Describe how the integrity of the pipe coating will be maintained if the pipeline is bored beneath roadways. Do not push or slide pipe into place.

Safety During Operation/Maintenance – Describe the safety training and staffing schedule of facility personnel. Describe chemical storage issues (i.e., list chemicals stored and potential hazards), the safety features of the pipeline and separator and compressor facilities, and the potential safety issues for homes on top of the gas field. Identify the schools, hospitals, power lines, and other public buildings in the proximity of the project and its buildings, and describe how safety issues will be addressed. Describe the anticipated schedule for repair and maintenance of the pipeline and associated facilities. What sort of security to prevent public access around the pipeline will be put in place, i.e., locked gates, fences. Who will maintain these security devices? Identify whom to contact regarding damages should an incident occur.

Agricultural Impacts

Pipeline Route – Avoid agricultural fields, or use the edges of fields or county roads/existing easements. When a pipeline goes diagonally across a field, it is difficult to pinpoint the location in the future. Property values for old vines are much higher than for newer vines.

Agricultural Production/Productivity -- Consider both the short-term and long-term impacts to agricultural lands. Describe the amount of agricultural land that will be taken out of production, short- and long-term. Changing the age of vines creates more complex management of that area for the grower (irrigation is different). How will older vineyards be avoided or compensated if avoidance is not possible? Describe the extent of losses of productivity from removal of vineyards and how they will be addressed/compensated.

Irrigation – The pipeline route (trenching) would change the agricultural features of the soil (irrigation needs). Describe how project sponsor will compensate farmers’ changing irrigation needs. Describe potential damages to irrigation systems (both drip and flood) from project construction, operation, and maintenance and how these damages will be addressed. Do not install pipe on land using flood irrigation during the irrigation season (the best time would be early April through late May).

Spraying – Applicant should visually inspect the four corners of fields before commencing pipeline installation to ensure they are not entering lands that have restricted access because of pesticide, fungicide, or sulfur spraying.

Pipeline Depth – Preserve the maximum future use of agricultural land. Pipeline depth of seven feet would allow for the maximum ripping depth. Three-foot depth is too shallow.

Delta Agriculture – Consider the potential for the pipe to float in the Delta peat soils. Consider using fill material in place of peat soils on the Delta islands. The buried pipeline could affect subsurface irrigation on the island by interrupting the subsurface flow. Consider the historical and projected land subsidence in the Delta and the ability to maintain the depth of the pipeline over time.

Easements – Permanent indemnity clauses need to be included in easement grants. Clarify responsibilities for maintaining pipe depth in the easement agreements.

Construction Impacts – Consider the possibility that pests and disease (nematodes, Phylloxera) may be transported between fields by the construction equipment. Describe potential impacts to traffic circulation in the vicinity of vineyards and how transport of crops will be ensured.

Catastrophic Event – Describe the potential impacts to the agricultural and grape-growing industries from a catastrophic event such as an explosion, and the contingencies to address such an event.

Rural Character

Consider rural aesthetics and character. The project appears to be consistent with the San Joaquin County General Plan.

Economic Impacts

Consider the impacts on property values, including the long-term effects from the easements, the presence of storage wells, and changes in insurance rates.

Levee Stability

Boring under levees could create stability problems. How will levee integrity be insured in the vicinity of Twitchell and Sherman Islands, given the threat of saltwater intrusion into water used for drinking water.

Water Quality

Reinjected Water – Consider the impact of injected water on groundwater quality. Describe the source, frequency, volume and flow rates for reinjected water. Describe the existing quality of groundwater.

Wells – Consider the possibility that the gas or water wells will contribute to the movement of water between groundwater aquifers. Consider the possibility of well leaks due to seismic activity. Describe how well water will be monitored, and who would enforce water quality requirements.

Storage Facility – Describe the potential for the gas pressure in the storage facility to push the brackish water into a freshwater aquifer. There is no known contamination from gas extraction activities in the area (DOGGR).

Pipeline – Describe the potential for pipeline leaks and impacts to soil and groundwater.

Groundwater

Prior Uses & Contamination – EIR should describe nature of groundwater contamination that occurred during prior use of proposed underground storage basin, the source, location of areas contaminated, and how Applicant will prevent a recurrence of similar releases.

Describe the flow and depth of groundwater in the project area. Address how instances of high groundwater during construction trenching will be handled, particularly the disposal of water that fills trenches. Include plans to contain soils in the event they are too saturated to form piles.

Geological

General – Provide a general overview of the process used to conduct geological/geotechnical studies.

Geologic Stability – Consider the potential for fracturing of the cap layer and the release of stored gas and the potential impact on geologic stability from reinjection of water. Evaluate potential impacts to hydrocarbon zones.

Soils – Describe the soil profile in the project area, and discuss potential impacts on soil structure and tilth due to construction and operation of the project.

Hazardous Materials

Storage and Management – Describe any hazardous materials storage at each of the facilities. The applicant must prepare a hazardous materials management plan and an Accidental Release Prevention Program before operating the facility.

Surface Water

Flooding – Describe the inundation area for upstream dams, the flood zones, and any potential impacts to the facilities from flooding or inundation. Include Gill Creek in these studies, as it floods frequently and the pipeline will be within 25 feet of the creek bank.

Surface Water Flows – Describe any planned changes to water direction, placement, and flow. Major water features cannot be altered by the project. Consider potential impacts to or disruption of the major drainage ditches on the Delta islands.

Surface Water Quality – Consider the potential for pipeline ruptures, potential water quality impacts for pipeline crossings, and hazardous materials spill contingency plans.

Wetlands and Habitat

Potential Impacts – Describe potential impacts to wetlands, including seasonal wetlands, vernal pools, and riparian areas, and how those impacts will be avoided, minimized, and mitigated.

Review and consider Sacramento County's policy to ensure no net loss of wetlands. Consider potential impacts to Fish and Game's 13 fishponds in the White Slough area (former Peripheral Canal corridor). Identify nearby preserves (including wildlife habitat planned for Twitchell and Sherman Islands) and describe how potential project impacts will be avoided, minimized, and mitigated. Construction and operation of the pipeline through the Cosumnes River Preserve conflicts with its preservation and restoration goals.

Mitigation – The San Joaquin County Habitat Conservation Plan has not been approved, however there may be some potential to define any natural resources mitigation in a way that is consistent with the HCP.

Wildlife

Potential Impacts – Describe fish and wildlife, including listed and sensitive species (Greater sandhill crane, Swainson's hawk, Giant garter snake), the corridors, nesting areas and habitat (including seasonal) used in the vicinity of the project and how impacts to these resources will be avoided and minimized. Discuss timing of biological assessment and project review process.

Construction – Summer construction would avoid impacts to wintering waterfowl on Twitchell and Sherman Islands.

Air Quality

Nonattainment – Both EPA and ARB have designated SJV as a nonattainment area for ozone and PM₁₀. Identify both stationary and mobile sources of emissions and mitigation measures. Identify sensitive receptors (residents, schools, and hospitals).

Construction Impacts – Evaluate potential emissions of fugitive dust and heavy equipment during construction, provide a timeline for project construction, and develop a rehabilitation plan for excavated and graded areas.

Ozone Precursors – Evaluate the emissions of ozone precursors (NO_x) from the compressors. Include discussion of the size and type of the compressors and evaluation of electric compressors. In comparing the types of compressors, the air district will examine best available control technology. For NO_x, the District's standard for comparison is \$9,700 per ton of pollutants removed.

Toxic Emissions – Consider the potential emissions of harmful chemicals or carcinogens. The analysis should consider the distance to each receptor near the compressor facility. The air district has different standards, depending on the type of receptor (business, residence, etc.).

Odors – Discuss the potential of the facilities to create a nuisance from odorous emissions and how they will be addressed. Describe the source and potential increase in odors on Sherman Island that the project may contribute.

Land Use

Describe the predominant land uses in the immediate and surrounding project area, including the area's significance as a recognized wine-grape producing region, and how the project may affect this regional identity.

Describe the zoning for the proposed facilities. Locate the compressor facility in an area zoned for industrial use.

Noise

Conduct noise surveys more than one time, and include the influence of "the Delta breeze."

Identify sensitive receptors, including residences. Describe and evaluate potential noise impacts from engines, the compressor facility, trucks, and other specified locations, and how it will be monitored long-term and mitigated, particularly at night. Do not permit compressor facility to operate between 6pm and 6am. Use available acoustical technology to address these issues.

Evaluate noise from an electronic compressor compared to a natural gas compressor.

Visual Impacts

Compressor Facility – Consider the potential visual impacts of the compressor facility.

Describe the plans for shielding the compressor facility. Consider building several floors of the facility below ground.

Other Facilities – Describe the appearance and visual shielding of the wells and separation facility. The Lodi area is striving to improve its image as an important wine growing area.

Cultural Resources

Identify and consider impacts to cultural resources in the project area.

Growth Inducement

Discuss the potential for the project to encourage increased business location and other future development (i.e., new emission sources) in San Joaquin County. Consider the project's growth-inducing and cumulative impacts on fish, wildlife, water quality, and vegetative resources.

3. Permitting

Hazardous Materials Management

Any construction facility that will exist for more than 30 days must have a Hazardous Materials Management Plan.

County Public Works

Sacramento County – Roadway encroachment permits will be required for any construction in the public roadway right-of-way. DPW would like to review directional drilling designs. A permit will be required in Sacramento County for any fill or grading greater than 350 cubic yards.

San Joaquin County – Roadway encroachment permits will be required for any construction in the public roadway right-of-way. A franchise agreement with San Joaquin County is likely to be required. Any road closure plan longer than half a day will require Board approval.

County Planning

San Joaquin County Planning anticipates several discretionary (staff level) permits for the project, such as a use permit. To grant these permits, the County needs to see verification of the applicant's access to or use of each property.

Air Quality

An Authority to Construct (ATC) and Permit to Operate (PTO) may be needed for stationary sources. The San Joaquin Air District is willing to begin review of a permit application, but they will not grant the permit before completion of the EIR process.

Waterway Crossings

State Lands Commission – The Commission has jurisdiction over all river crossings except Jackson Slough. The Commission prefers to review the lease application during the Draft EIR comment period. Their Long Beach engineering staff will also review the application. Commission will grant one lease for all of the crossings. They can't recommend approval without landowner access issues resolved. The Mineral Resources group will review the project if any part of the storage area is beneath state lands.

Reclamation Districts – The local reclamation districts will review engineering details for waterway and levee crossings and grant permission for construction. They want more detailed geotechnical evaluation and expect that crossings will need to be deeper (60-90 feet) than currently planned (20 feet).

Additional Consultation – Consult with the Army Corps, the Reclamation Board, and the San Joaquin County Flood Control and Water Conservation District.

Wells and Storage Field

Division of Oil, Gas, and Geothermal Resources (DOGGR) – DOGGR issues permit for wells. They will review application, but not approve it, during CEQA process. They will notify landowners of the proposed permit. If there is controversy, they will hold a public hearing. CPUC is responsible for pipeline safety for all gas storage facilities (DOGGR/CPUC MOU).

4. Application and Environmental Review Process

Notification

Describe the notification process used to alert the public of the proposed project, the locations of project documents, and the public's opportunities for input.

Application and Review Process

General Process – Provide a general overview of the review process, including appeals, and identify areas of jurisdiction and decision-making authorities. Include a discussion of the overall timeframe for the process. [Explain and make distinctions between the process to evaluate environmental impacts of the proposed project versus the application for a facility license.]

Environmental Process – Explain how the environmental review can be complete with less than 12 months of environmental data. There is a public perception and concern that decisions around the project have already been made—that is, that the project is “a done deal.” Clarify the property access needs for the environmental review.

Commission Process – The hearings or decision should not happen during the grape harvest. Final hearings, in particular, should be held close to the project so that local property owners could attend. Explain where and how property rights issues will be addressed. Explain the environmental recommendation to the Commission. Local landowners would like to have consultant assistance to help them comment effectively. Some local interests feel there is little trust for the CPUC.

Other Projects

Gas Storage Projects – Describe the other gas storage projects in California and the Delta, and the experience with these projects. Provide information about whether local landowners can visit the facilities to see how they operate.

Reasonably Foreseeable Projects – Consider the potential future projects in the Delta, including conversion to wetlands (Sherman and Twitchell Islands), future nature preserves (Staten Island), levee setbacks (Staten and Twitchell Islands), and expanded capacity in the form of another pipeline.

Related Projects – Describe the potential impacts of the proposed project on plans to urbanize and develop the surrounding region. Describe how the proposed pipeline will co-exist with alternatives considered by CALFED to improve the Delta.

Eminent Domain

General Concerns – Clarify whether eminent domain applies to mineral rights as well as surface rights. A private company should not have the power of eminent domain; SB 177 would prevent private companies from receiving the power of eminent domain.

Access After Construction – Clarify the access requirements once the project is complete, including frequency, purpose, and notification of access.

Environmental Document

Explain the roles of the CPUC and the applicant in the preparation and circulation of the environmental document. Describe the various alternatives considered and how public comments were considered in the selection of the alternatives studied. Include an alternative that

specifically reduces impacts to wildlife and fish. Include a map showing the location of storage facility. List the names of agencies and consultants involved in the project, including contacts.

Public Outreach

Establish a contact person during construction.

Agency Consultation Follow-up

- Reclamation Board
- Army Corps of Engineers
- CALFED
- Caltrans
- Sacramento County Planning
- Delta Protection Commission
- Sacramento County Farm Bureau
- US DOT Office of Pipeline Safety
- CPUC Office of Safety