EXHIBIT A – RESPONSE TO CEQA COMMENTS

PG&E GAS LINE 021G REPLACEMENT PROJECT ACROSS THE PETALUMA RIVER

INITIAL STUDY(IS)/MITIGATED NEGATIVE DECLARATION (MND) RESPONSE TO COMMENTS

City of Petaluma

Comment CITY-1. City Permit Requirements

Section 1.7.2 (Other Agencies) provides a list of permitting agencies and approvals/regulatory requirements anticipated. Table 1-1 notes that approval of an agreement for temporary closure and use of Shollenberger Park from the City of Petaluma will be required. We note the following approvals will also be required by the City of Petaluma:

- Lot Line Adjustment to establish a permanent easement for the new pipeline and a temporary easement for construction of the new pipeline.
- Special Discharge Permit for discharge of water to the sanitary sewer system (noted on page 2-9 of MND).
- Encroachment permit through Petaluma Public Works & Utilities to work within City right-of-way/public property which also includes final approval of trail restoration to pre-construction conditions.

The City recommends the MND be updated to include the above in approvals/regulatory requirements anticipated by the City of Petaluma.

COMMISSION RESPONSE TO COMMENT CITY-1

Table 1-1 has been revised to add the City's approvals as requested.

Comment PROJ-1. Project Description

It is understood that a portion of the existing pipeline will be removed and approximately 1,280 feet of pipeline and 2,540 feet of driplines in upland locations will be decommissioned and retired in place in a manner consistent with adopted PG&E policies. The City would like additional information to understand why some portions of existing infrastructure will be removed and others will remain in place.

The City recommends that the project description section of the MND be updated to provide a brief rationale for why portions of the existing pipeline and dripline will be decommissioned and retired in place as opposed to removed and disposed of.

COMMISSION RESPONSE TO COMMENT PROJ-1

Sections ES.1 and 2.0 have been revised to explain that the retired line would not conflict with current land use and leaving it in place would reduce the amount of excavation, work area, and project duration. The pipelines in the river will be removed because PG&E inspections determined that portions of the original subsurface pipeline and/or associated infrastructure beneath the Petaluma River could become damaged during periodic dredging activities conducted by the U.S. Army Corps of Engineers to improve conditions for navigability of the Petaluma River.

Biological Resources

Comment BIO-1

Section 3.4.2 (page 3-34) of the MND provides a discussion of the federal, state, and local regulatory setting related to biological resources that are relevant to the project. Section 3.4.2.2 discusses applicable City of Petaluma General Plan policies, however, no other local regulatory setting information is provided. Of particular relevance to the site and the project is the Shollenberger Marsh Management, Maintenance and Monitoring Plan (3M Plan) prepared by GHD, September 2014 which describes the management, maintenance, and monitoring plan for Shollenberger Marsh, establishes long-term management and habitat goals, identifies cost-effective methods to enhance or re-establish and maintain habitat for the salt marsh harvest mouse (SMHM), and evaluates opportunities to establish, protect, or enhance a SMHM habitat corridor along a portion of the Petaluma River near the Shollenberger Marsh.

The City recommends that the MND be updated to include a summary of the applicability of the 3M Plan.

COMMISSION RESPONSE TO COMMENT BIO-1

Section 3.4.2.3 has been revised to describe the 3M Plan and its applicability to the project. Because no dredged material is proposed to be disposed of in the Shollenberger Park as part of this project, the 3M Plan does not apply to the Project.

Comment BIO-2

Section 3.4.3.4 (Impact to Mammals) concludes that implementation of Mitigation Measures BIO-1 (Environmental Training Program), BIO-2 (Biological Monitoring), and BIO-7 (Protection of Terrestrial Marsh Species) will reduce impacts to less than significant. As shown in Figure 3 of the 3M Plan (referenced above), SMHM habitat is known to occur throughout Shollenberger Park,

including along proposed access roads and adjacent to the dredge material disposal site. MM BIO-7 sets forth that "work areas within 200 feet of tidal marsh shall be bordered by temporary exclusion fencing."

The City recommends that the MND be updated to identify the total area of SMHM habitat impacted by project construction activities including modifications to access roads. Mitigation measures should be updated to ensure consistency with the 3M Plan, including but not limited to replacement of SMHM habitat at a 2:1 ratio, unless determined otherwise by a qualified biologist.

COMMISSION RESPONSE TO COMMENT BIO-2

MM BIO-7 has been revised to include that no Project activities shall occur within 50 feet of tidal marsh habitat within two hours before and after an extreme high tide event. In addition, MM BIO-7 now includes language for exclusion fencing. The 3M Plan applies to the City's past and future dredge disposal operations, and to meet its obligations under the biological opinion. Since no dredged material is proposed to be disposed in Shollenberger Park as part of this project, the 3M Plan does not apply to the project.

Comment BIO-3

Bullet 4 of Mitigation Measure BIO-8 requires PG&E to prepare a habitat restoration and monitoring plan for restoration of temporary wetland impacts, subject to review and approval by CSLC.

The City recommends that Bullet 4 of Mitigation Measure BIO-8 be updated to include a reference to the 3M Plan to ensure consistency. In addition, it is recommended that PG&E prepare the restoration plan in coordination with the Petaluma Wetlands Alliance (PWA), a local volunteer organization that is actively involved in management activities at Shollenberger Marsh. The mitigation measure should also be updated to require review and approval by the City of Petaluma Community Development Department, Planning Division, and the California Department of Fish and Wildlife.

COMMISSION RESPONSE TO COMMENT BIO-3

MM BIO-8 has been revised to require that the restoration plan be prepared in consultation with the Petaluma Wetlands Alliance, the City of Petaluma, and CDFW.

Comment BIO-4

Impact (f) related to impacts associated with a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or

other approved local, regional, or State habitat conservation plan does not include a discussion of the 3M Plan.

The City recommends that the MND be updated to include a discussion of the project's consistency and/or conflict with the 3M Plan.

COMMISSION RESPONSE TO COMMENT BIO-4

Section 3.4.2.3 has been revised to describe the 3M Plan and its lack of applicability to the Project. No revisions to the impact conclusions are necessary.

Comment BIO-5

It is understood that permits from regulatory agencies (e.g., USACE, CDFW, RWQCB) will be required.

The City recommends that the Mitigation Measures in the MND be updated, as appropriate to state that permits acquired from the regulatory agencies will be provided to the City of Petaluma in advance of project construction activities.

COMMISSION RESPONSE TO COMMENT BIO-5

Although not required under CEQA, CSLC staff recommends PG&E continue consultation with the City of Petaluma and provide regulatory permits as requested. No changes to the mitigation measures were made.

Greenhouse Gas Emissions

Comment GHG-1

Section 2.2.2.2 (Phase 2) indicates that 44,000 cubic feet of natural gas will be released from the existing pipeline into the atmosphere prior to removal. Impact (b) includes a brief discussion of the project's consistency with the City of Petaluma General Plan as it relates to the incorporation of BMPs during project construction, however, there is no discussion of the project's impact as it relates to a conflict with the Climate Emergency Framework, adopted January 11, 2021. As set forth in the Framework, the City of Petaluma has a goal of reaching carbon neutrality by 2030. The release of 44,000 cubic feet of natural gas into the atmosphere is therefore inconsistent with the Framework, which was adopted for the purpose of reducing greenhouse gas emissions.

The City recommends that a discussion of the project's potential to conflict with the Climate Emergency Framework be analyzed and potential feasible mitigation measures be included that would offset the release of 44,000 cubic

feet of natural gas into the atmosphere, thereby achieving carbon neutrality consistent with the City's adopted plan.

COMMISSION RESPONSE TO COMMENT GHG-1

Section 3.9.3b has been revised to describe the applicability of the City of Petaluma, County of Sonoma, and State GHG reduction goals for 2030. No additional mitigation measures are required.

Comment GHG-2

Impact (a) states that the project would only generate GHG emissions during project construction. Although it is understood that the project proposes replacement of an existing natural gas facility to make necessary safety improvements, prevent natural gas leaks, and ensure ongoing service reliability, there is no discussion in the impact analysis of the capacity of the existing and proposed pipelines, therefore the conclusion that there will be no operational GHG impacts is not supported by evidence.

The City recommends that the analysis provide evidence supporting the conclusion that the project will not result in operational GHG impacts. If the new pipeline will have additional capacity as compared to the existing pipeline, impacts of such operational emissions should be analyzed consistent with the most recent BAAQMD thresholds of significance and mitigation measures identified, as appropriate. Please clarify ongoing maintenance activities and any periodic line testing that may involve release over the life of the project. See also GHG-1 above regarding mitigating potential impacts from GHGs.

COMMISSION RESPONSE TO COMMENT GHG-2

Section ES.1 has been revised to clarify that the Project would not result in a change to the operational parameters (i.e., capacity, operational throughput, maintenance, or line testing) of PG&E's existing natural gas pipeline system given that the Project would only result in the replacement of a short segment of an existing pipeline.

Hazards & Hazardous Materials

Comment HAZ-1

The MND states "Agricultural lands in the southern work area were previously under cultivation for hay and are presently fallow." The MND does not identify potentially hazardous materials that could be present onsite associated with prior agricultural use. It is noted that Mitigation Measure HAZ-1 requires preparation of a Project Work and Safety Plan (PWSP) which is required to include measures for proper disposal of soils containing residual pesticides, however, presence of residual pesticides is not clearly described in the impact analysis.

The City recommends that the impact analysis be updated to clarify the former agricultural uses and potential residual pesticides that may be present.

COMMISSION RESPONSE TO COMMENT HAZ-1

Section 3.10.3a has been revised to note that agricultural lands were previously under cultivation for hay and may have had pesticides applied, and residual levels of pesticides may be present in soil. The impact analysis was not revised.

Hydrology & Water Quality

Comment HYDRO-1

As proposed, the project includes modifications to existing access roads throughout the site including establishment of laydown, staging, and construction areas. The figure below shows the location of an existing weir, which is critical to ensuring dredged materials reach the appropriate dissolved oxygen requirements prior to discharge into the Petaluma River. In this area, the width of the access road is limited by the weir. The MND does not identify the location of the existing weir, and as such, potential impacts to hydrology and water quality as a result of project construction proximate to the weir are not adequately analyzed.

The City recommends that the MND be updated to describe the location of the existing weir and update the hydrology and water quality impact discussion to identify potential impacts to the weir as a result of project construction. The analysis should include a discussion of the maximum vehicle and construction equipment types and their respective operating loads vis-a-vis the levee load capacity, in addition to size and turning radius limitations that need to be considered for the completion of proposed construction activities. If additional impacts are identified, implement feasible mitigation measures as appropriate.

COMMISSION RESPONSE TO COMMENT HYDRO-1

Section 3.11.3a has been revised to clarify that while some turns of the access road would be temporarily widened during construction activities to accommodate the turning radius of equipment, most straight sections of the access road and the weir (shown on Figure 2-2A) would not be modified. Based on those revisions, no additional impacts were identified.

Recreation

Comment REC-1

Impact (a) concludes that although Shollenberger Park will be closed for a period of 5 months which will result in increased use of other recreational facilities, with implementation of Mitigation Measure REC-1 impacts relating to deterioration of recreational facilities will be less than significant. MM REC-1 requires PG&E to submit a plan identifying commitments to ensure deterioration of park facilities will not occur and also requires the plan to identify temporary put-in and take-out locations for river recreation. As the put-in and take-out locations required to be identified by MM REC-1 are not known, impacts of activities associated with putting in and taking out recreational water vessels have not been fully analyzed.

The City recommends that put-in and take-out locations be identified and described as part of the project description. Include detailed information on the location and any necessary temporary improvements that will be needed to accommodate recreational water vessels and analyze impacts to environmental resource areas (e.g. biological resources) as appropriate.

COMMISSION RESPONSE TO COMMENT REC-1

Section 3.17.1 has been revised to include mention of additional existing sites where recreational opportunities are available for launching and taking out water vessels. As these existing sites are already in use for public recreation, no improvements would be necessary or impacts to natural habitat would occur to accommodate recreational water vessel use. MM REC-1 has been revised to address the City's concerns.

Comment REC-2

In addition to typical park users, the Petaluma Wetlands Alliance operates an annual third-grade educational program at Shollenberger Park, serving approximately 28-30 classes and 750-800 students each year. The intent of the program is to educate students about Shollenberger's wetlands, diverse habitats, and the importance of the Petaluma River to this unique ecosystem. Initial outreach and scheduling for the program begins in August with visits to the park between early October and mid-November and mid-March through mid-May.

The City recommends that to ensure continued access and operation of the PWAs educational program, the applicant and CSLC should consider an alternative construction plan that would limit access to the north and east access roads, thereby maintaining public access, including access for PWAs educational program, along the existing trails on the western portion of the site, adjacent to Alman Marsh. In addition, MM REC-1 should be updated to include coordination with the Petaluma Wetlands Alliance to ensure continued operation of this important educational program.

COMMISSION RESPONSE TO COMMENT REC-2

Section 3.17.3a has been revised to include additional details of PG&E's plans for the closure of Shollenberger Park. PG&E is still working on the details for limited public opening on weekends during the construction duration and will finalize those plans with the City of Petaluma prior to construction. PG&E will also work directly with the Petaluma Wetlands Alliance to make sure educational groups can safely navigate their way through the park as needed.

Comment REC-3

The MND assumes that recreational trips will be diverted to Helen Putnam Regional Park and Tolay Lake Regional Park, located approximately 5.8 and 6.2 miles from Shollenberger Park, respectively which will contribute to additional vehicle miles traveled and greenhouse gas emissions that would otherwise not be realized. Two existing recreational facilities, Alman Marsh and Ellis Creek Water Recycling Facility, are located adjacent to Shollenberger and are more comparable in their offerings and ecological setting as compared to Helen Putnam and Tolay Lake Regional Parks. Furthermore, Shollenberger, Alman Marsh, and Ellis Creek are non-fee based recreational facilities whereas regional parks require payment of fees for parking.

The City recommends that the MND be updated to reference anticipated use of Alman Marsh and Ellis Creek Water Recycling Facility during park closure. MM

REC-1 should be updated to remove reference to Sonoma County Regional Parks. The City requests that as part of the plan prepared pursuant to MM REC-1, due to increased patronage and wear and tear of these parks caused by the temporary closure of Shollenberger Park, PG&E coordinate with the Parks & Recreation Department to discuss opportunities for financial contribution to the repair (temporary or permanent) of the existing boardwalk located at Alman Marsh, which would expand recreational access and offset the lack of access to Shollenberger throughout project construction.

COMMISSION RESPONSE TO COMMENT REC-3

Section 3.17.3a has been revised to include additional recreational facilities. MM REC-1 has been revised to address the City's concerns. The plan required under MM REC-1, which will be submitted to the City of Petaluma Parks and Recreation Department, will identify PG&E's commitments (financial or otherwise) to ensure that substantial deterioration to trails and other facilities does not occur as a result of displaced visits from Shollenberger Park.

Utilities and Service Systems

Comment UTIL-1

Impact (c) states that the project will result in no impact to the City's wastewater system, however, the analysis does not include a discussion of discharge to the city's sanitary sewer system as a result of excavation, which is anticipated as noted on page 2-9 of the MND.

The City recommends that the impact analysis be updated to include a discussion of discharge associated with excavation, including the anticipated quantity of discharge and potential impacts. Please note, the City is unable to accept high-salinity brackish water (e.g., river water).

COMMISSION RESPONSE TO COMMENT UTIL-1

Section 2.2.2 has been revised to clarify that none of the discharged water would be conveyed to the City's wastewater system. No revisions to the impact analysis are necessary.

Alternatives

Comment ALT-1

The MND does not include a discussion of alternatives to the closure of Shollenberger park for the duration of project construction.

While the City understands that alternatives are not explicitly required as part of an MND, given the importance of this valuable recreational amenity to the City of Petaluma and its residents, the City respectfully requests that an alternative plan be considered that would allow for continued access to Shollenberger park during construction activities and impacts be analyzed accordingly (see REC-1 above). If the alternative plan is deemed infeasible, we recommend a discussion of the consideration of alternatives be included in the project description or background section of the MND.

COMMISSION RESPONSE TO COMMENT ALT-1

Section 3.17.3a has been revised to include additional details of PG&E's plans for the closure of Shollenberger Park. PG&E is still working on the details for limited public opening on weekends during the construction duration and will finalize those plans with the City of Petaluma prior to construction. No revisions to the MND are necessary to discuss alternatives to the project.

Cumulative Comment

The City would like to inform the applicant and CSLC of additional construction projects forthcoming at Shollenberger Park. To ensure seamless coordination between the proposed pipeline replacement project and the City projects listed below, the City respectfully requests that any changes in the project construction timeline be communicated early on.

- Dredge removal project (in design process)
- Shollenberger Park Amphitheater and Kiosk (in design process)

COMMISSION RESPONSE TO CUMULATIVE COMMENT

This comment has been noted. Because the City of Petaluma is a responsible agency for the Project, and as such has jurisdiction to consider PG&E's application for a lot line adjustment for the utility easement among other permits (described in Comment City-1), it is expected that PG&E will consult with the City regarding the construction timeline. No change to the cumulative context is necessary.

California Department of Fish and Wildlife (CDFW)

Comment 1, Section 3.4, Mitigation Measure Shortcoming

Mitigation Measure (MM) BIO-5 does not provide adequate avoidance measures for the CRR and CBR [California Ridgway's rail and California black rail], both fully protected species.

To reduce impacts to CRR and CBR to less-than-significant and comply with Fish and Game Code CDFW recommends replacing MM BIO-5 with the mitigation measures provided in the comment letter on page 4.

COMMISSION RESPONSE TO COMMENT-1

MM BIO-5 has been revised as requested by CDFW.

Comment 2, Section 3.4, Mitigation Measure Shortcoming

Mitigation Measure (MM) BIO-7 does not provide adequate avoidance measures for the SMHM [salt marsh harvest mouse], a fully protected species.

To reduce impacts to SMHM to less-than-significant and comply with Fish and Game Code, CDFW recommends the mitigation measures provided in the comment letter on pages 4, 5, and 6.

COMMISSION RESPONSE TO COMMENT-2

MM BIO-7 has been revised as requested by CDFW.

Comment 3: Section 3.4, Environmental Setting Shortcoming

The MND does not evaluate potential impacts to SSBB [soft salty bird's-beak]. California Natural Diversity Database (CNDDB) records indicate a 1993 occurrence of SSBB within 3.5 miles of the project site, and it appears suitable habitat for the species is present at and adjacent to the project site.

For an adequate environmental setting and to reduce impacts to special-status plants to less-than-significant, CDFW recommends including the mitigation measures provided in the comment letter on pages 6 and 7.

COMMISSION RESPONSE TO COMMENT-3

Section 3.4.1.2 has been revised to include a description of the soft salty bird's-beak. A floristic survey of the Project area following the guidelines of CDFW and USFWS was conducted on June 26 and 27, 2023 and submitted to CDFW. The survey did not identify any listed or special-status plant species within the survey area. CDFW has agreed that under CEQA, impacts to soft salty bird's-beak

would be less than significant. A project requirement for additional surveys (if requested by CDFW) will be included in the lease.

Comment 4: Section 3.4, Environmental Setting Shortcoming

The MND does not evaluate potential impacts to LFS [longfin smelt]. An unpublished report titled "Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary" documented LFS within the Petaluma River at or near the project location (Lewis et al. 2019).

For an adequate environmental setting and to reduce impacts to LFS to less-than-significant, CDFW recommends including the mitigation measure provided in the comment letter on page 7.

COMMISSION RESPONSE TO COMMENT-4

Section 3.4.1.2 has been revised to include a description of the longfin smelt. MM BIO-3 has been updated to include the longfin smelt, and Appendix D-1 has been updated to include the longfin smelt in the Potential to Occur table.

Comment 5: Section 3.4, Environmental Setting Shortcoming

The MND does not address potential impacts to California red-legged frog (*Rana draytonii,* CRLF). CNDDB records indicate a 1994 occurrence of CRLF within 0.85 miles of the project site. The project site is located within the California Wildlife Habitat Relationships predicted range for the species and supports potentially high value habitat.

For an adequate environmental setting and to reduce impacts to CRLF to less-than-significant, CDFW recommends including the mitigation measure provided in the comment letter on page 8.

COMMISSION RESPONSE TO COMMENT-5

Section 3.4.3.2 has been updated to explain that amphibian species, including California red-legged frog, are not expected to be present within the Project site due to the saline condition of the waters there. Red-legged frog have not been detected in Shollenberger Park, and the known occurrences in Ellis Creek are mainly in freshwater environments. No additional mitigation measures are required. During consultation, CDFW agreed that under CEQA, impacts to CRLF would be less than significant. A project requirement requiring additional surveys (if requested by CDFW) will be included in the lease.