

From: [Kathy Angus](#)
To: [Ronen, Hillary](#); [Beinart, Amy \(BOS\)](#); [BOS Legislation, \(BOS\)](#)
Subject: BOS File #200800 Viani Response to PG&E
Date: Saturday, September 12, 2020 11:27:57 AM
Attachments: [spv9-11lettertobenavides.pdf](#)

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Dear Hillary,

Attached is the letter from Steve Viani in response to PG&E information received regarding construction at 3216 and 3216 Folsom Street to be included in the file.

Kathy Angus
BH South Slope Organization

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Kathy Angus

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SP VIANI P.E.

September 11, 2020

Mr. Francisco Benavides
Senior Vice President and Chief Safety Officer
Pacific Gas & Electric Corporation

RE: Appeal of CEQA Revised Final Mitigated Negative Declaration

San Francisco City and County (CCSF) Planning Case No. 2013.1383ENV
Building Permit Application Nos. 2013.12.16.4318 and 2013.12.16.4322
3516 and 3526 Folsom Street

Dear Mr. Benavides:

My office has been retained to advise residents of the Bernal Heights in San Francisco regarding an existing PG&E 26-inch diameter gas line, known as L109, which runs through the neighborhood. As you may know, the San Francisco City and County Board of Supervisors has granted a continuance to the proceedings to allow us to review material recently sent by PG&E that we were not previously provided. In particular, I have been asked to review the new documents provided, but the volume of material, 315 pages, sent within a week, precludes an exhaustive review before the proceeding. Therefore, we will focus our comments on the new information provided. The comments in our September 2, 2020 letter are still valid and open.

Comments on New Information Provided

One of the documents provided is an email from Jon Freeman to Fabien Lannoye dated March 6, 2018 which appears to have as an attachment a "PGE internal" document from PG&E's Joe Sun dated September 3, 2017 concerning work done by John Eiding PE/SE with G&E where Joe Sun requested a brief letter report concerning whether a PGV of 2.0 inches per second is a reasonable vibration criteria for L109 such that below which the construction activities can continue, and above which some type of review may be needed. Mr. Eiding responded yes and provided his technical basis for his response, as interpreted by Mr. Sun.

It appears that Mr. Eiding was provided very little information. PG&E did not provide to G&E any design drawings or details for the gas pipeline, such as jogs in the alignment or the presence of a 90° bend. Moreover, Mr. Eiding based his calculations on the following limits: $PGA < 0.3g$, $PGV < 15$ inches per second. The PGA value is normally a seismic velocity that is based on location and soil type. A code value for this location, based on ASCE7-16 is 0.744. A calculated value for PGV from a vibratory roller working over the pipeline could vary from 16.1 inches per second to 44.1 inches per second.

The information used by Mr. Eidinger was inaccurate and resulted in erroneous conclusions.

Unfortunately, Mr. Eidinger was not provided the location of the pipeline to get the proper PGA and none of the internal and external experts at PG&E sought to calculate vibration from compaction equipment even after knowing our concerns with PG&E's analysis to determine the accurate PGV's for the actual equipment needed for the grading work.

The fact Mr. Eidinger was not provided pertinent information concerning the pipeline geometry is troubling and obfuscates an in-depth analysis of the project. Over a 2 year period, starting in 2016, a concerned citizen, Mr. Rune Storesund PE, indicated issues with pipe slope, a 90° bend in the pipe, utility construction and jogs in the line; any of which can degrade pipeline integrity. He requested a risk validation be prepared pursuant to ASME Standard B31.8S to determine if methods are correctly characterizing the risk. His issues have never been addressed, nor can they be evaluated with the information PG&E has provided or chose to not provide.

Comments of Emergency Response Plan

While not prepared by PG&E, we are concerned that PG&E allowed the developer to prepare and submit an Emergency Response Plan that is inadequate, inaccurate and contrary to guidelines prepared by the Pipeline and Informed Planning Alliance (PIPA), a stake-holder initiative led and supported by the US Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA). In addition, the plan is contrary to Board of Supervisor resolution M17-152, which mandates a site-specific Emergency Response and Evacuation Plan be prepared to ensure adequate access for emergency response and the ability for a safe and timely evacuation. Unfortunately, the plan provided by the developer is not site-specific.

Some of the deficiencies are noted below:

- The evacuation route consists of arrows - drawn by the Project Sponsor, not the Fire Department or Dept. of Emergency Management - on a downloaded Google map to be posted around the neighborhood. To us, this attached map represents mass confusion as the arrows show incorrect evacuation routes- According to (Pipeline Association for Public Awareness) PAPA guidelines, during a major gas leak it is critical not to evacuate downhill - gas migrates and collects downhill; and, not to evacuate downwind - gas travels with the wind. This was not taken into account.
- This plan offers no community outreach or communication plan to residents within the evacuation zone specific to gas leaks. What should or shouldn't they do? There is no plan to identify elderly residents or residents with mobility issues if an evacuation were to occur.
- The plan includes a dangerously long 3-hour PG&E response time to a suspected leak. A lot can happen in 3 hours.
- The plan's 300-foot radius of evacuation area map is incorrect. The recommended minimum evacuation distance is 547' for a gas pipeline with a 100 psig for a 24" diameter pipeline, according to a table in PIPA's,

"Recommended Minimum Evacuation for Natural Gas Pipe Line Leaks and Ruptures." The distance could be considerably higher, up to 1000 feet, depending on gas pressure.

- There was no involvement of the SF Department of Emergency Management (DEM) - even though this is the agency with significant public safety interest in high-risk activities impacting the community. Only the Fire Department was involved in the review of this document and they approved it without comment.

It is my considered engineering opinion, based on 43 years of experience, some of which was in San Francisco working on the Clean Water Program, that serious equipment vibration concerns were not properly addressed in this Negative Declaration process and must be re-evaluated. The information and issues must be identified, located and carefully vetted in a follow up process which fully reviews the project information prior to approval of the permit.

If you need further information, please call me at 916-952-8503.

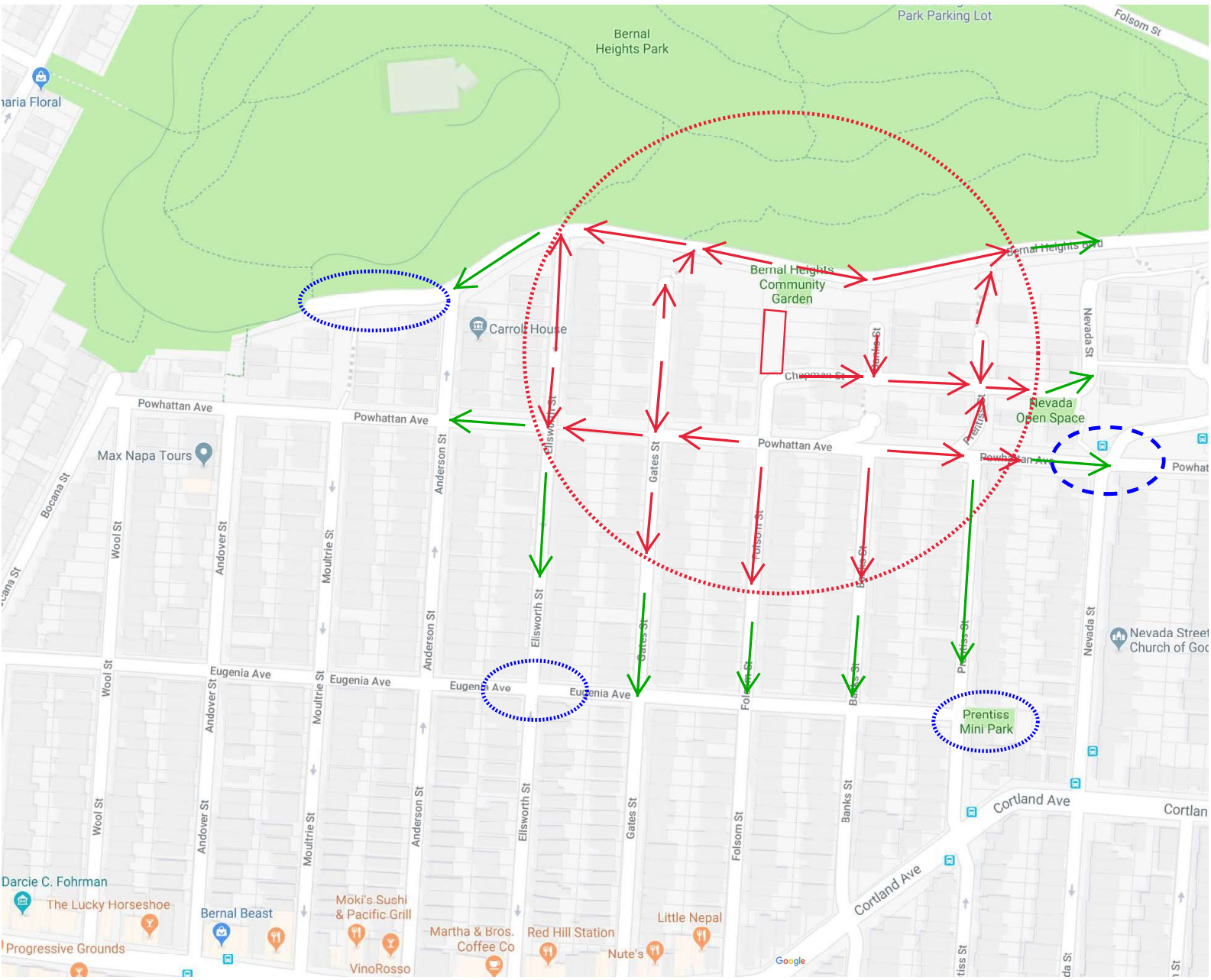
Sincerely,



Steven P. Viani P.E.
Civil Engineer C30965 exp. 3/31/22

Attachment





EVACUATION ROUTES

