



July 20, 2026

To: Jason Ramos
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202
CEQA.comments@slc.ca.gov

RE: Initial Study/Draft Mitigated Negative Declaration for
Threemile Slough Pipeline Crossings Remediation and
Decommissioning Project

Dear Mr. Ramos,

This letter provides comments by the Diablo Range District of the California Department of Parks and Recreation (State Parks) on the Initial Study/Draft Mitigated Negative Declaration (IS/MND) for the Threemile Slough Pipeline Crossings Remediation and Decommissioning Project. Under the California Environmental Quality Act (CEQA), State Parks has a role as a Trustee and a Responsible Agency. As a Trustee Agency, State Parks is responsible for protecting lands that are held in trust for the People of the State of California. As Responsible Agency, State Parks will need to permit any temporary or permanent encroachment onto Brannan Island State Recreation Area. This comment letter does not authorize issuance of a permit, or permanent or temporary easement, or indicate that any type of permit or easement will be granted.

Cultural Resources

The IS/MND states that if cultural resources are discovered during the project-related activities, then activities around the discovery shall stop until they are evaluated by PG&E cultural resource specialist, designated on-site archaeologist, and Tribal Monitor(s). If the discovery is on the Brannan Island State Recreation Area, State Parks should also be notified and consulted prior to any continuation of ground disturbance, and State Parks should also review and consult on any proposed treatment plan.

Natural Resources

The IS/MND states that a Site Restoration and Riparian Mitigation Plan (Plan) will be developed to provide for the replacement of riparian vegetation damaged or removed from Project work areas due to Project activities. The document states that the Plan shall be submitted to the California State Lands Commission (CSLC) and agencies with jurisdiction over restoration of the Sherman Island levee. State Parks does not have jurisdiction over Sherman Island levee. The Plan should also include restoration work required at Brannan Island State Recreation Area. State Parks is to be notified for review and approval of the Plan for any work at Brannan Island State Recreation Area at least 30 days before the start of construction.

The IS/MND states that CSLC is responsible for special status species surveys, avoidance, and mitigation. For activities within Brannan Island State Recreation Area, CSLC or its contractors, should provide advance notice to State Parks when surveys are scheduled, provide survey results, and consult with State Parks if impacts cannot be avoided.

The IS/MND includes payment into offsite mitigation banks as an option to achieve mitigation, however, impacts to natural and cultural resources within State Park units should be mitigated within the park unit where impacts occur in order to return park property and/or resources to a pre-project condition or better with the mitigation activities paid for by the project proponent. As you obtain required agreements/certification/permits, we encourage you to work with regulatory agencies to develop a mitigation framework for this project that will compensate State Parks for impacts to park property and the costs the department would incur to mitigate impacts, including those associated with increased invasive species management, permanent loss of native vegetation, and restoration of impacted native habitats and communities

Public Safety

A portion of the proposed project will occur within Brannan Island State Recreation Area, and a right of entry permit will be needed for any work that falls outside of the exiting easement and the rights contained therein, as acknowledged in Table 1-1 of the MND. This comment letter does not authorize issuance of or indicate that any type of permit will be granted. Additional review and approval by State Parks will be needed and will likely require additional information about proposed project activities to aid our evaluation of potential impacts within State Parks property. PG&E is encouraged to initiate the permit application with State Parks as early in the project planning process as possible.

If you have any questions about this comment letter or would like to discuss project activities on State Parks property, please contact Diablo Range District Environmental Coordinator, Diana Fong, at 925-599-7656 or diana.fong@parks.ca.gov.

Sincerely,

DocuSigned by:

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Clinton Elsholz
Diablo Range District Superintendent

Cc: California State Clearinghouse