

ATTACHMENT A

California Environmental Quality Act Supporting Documentation

California State University Monterey Bay Gas Distribution System Capacity and Reliability Project

PROJECT DESCRIPTION

Introduction and Background

The Gas Distribution System Capacity and Reliability Project (proposed project) consists of natural gas line replacement within the East Campus Housing Area on the California State University, Monterey Bay (CSUMB) campus. In October 2011, PG&E made a commitment to begin replacing more than 1,200 miles of plastic gas piping, manufactured by DuPont before 1973 under the name Aldyl “A”, across California due to its history of cracking and failing. This replacement program was prompted after a leaky plastic gas pipe sparked a fire at a condominium complex in Cupertino, California. Pacific Gas and Electric (PG&E) proposes to upgrade the natural gas distribution system within the East Campus Housing Area to reduce threats to the distribution system’s integrity and improve public safety and system reliability.

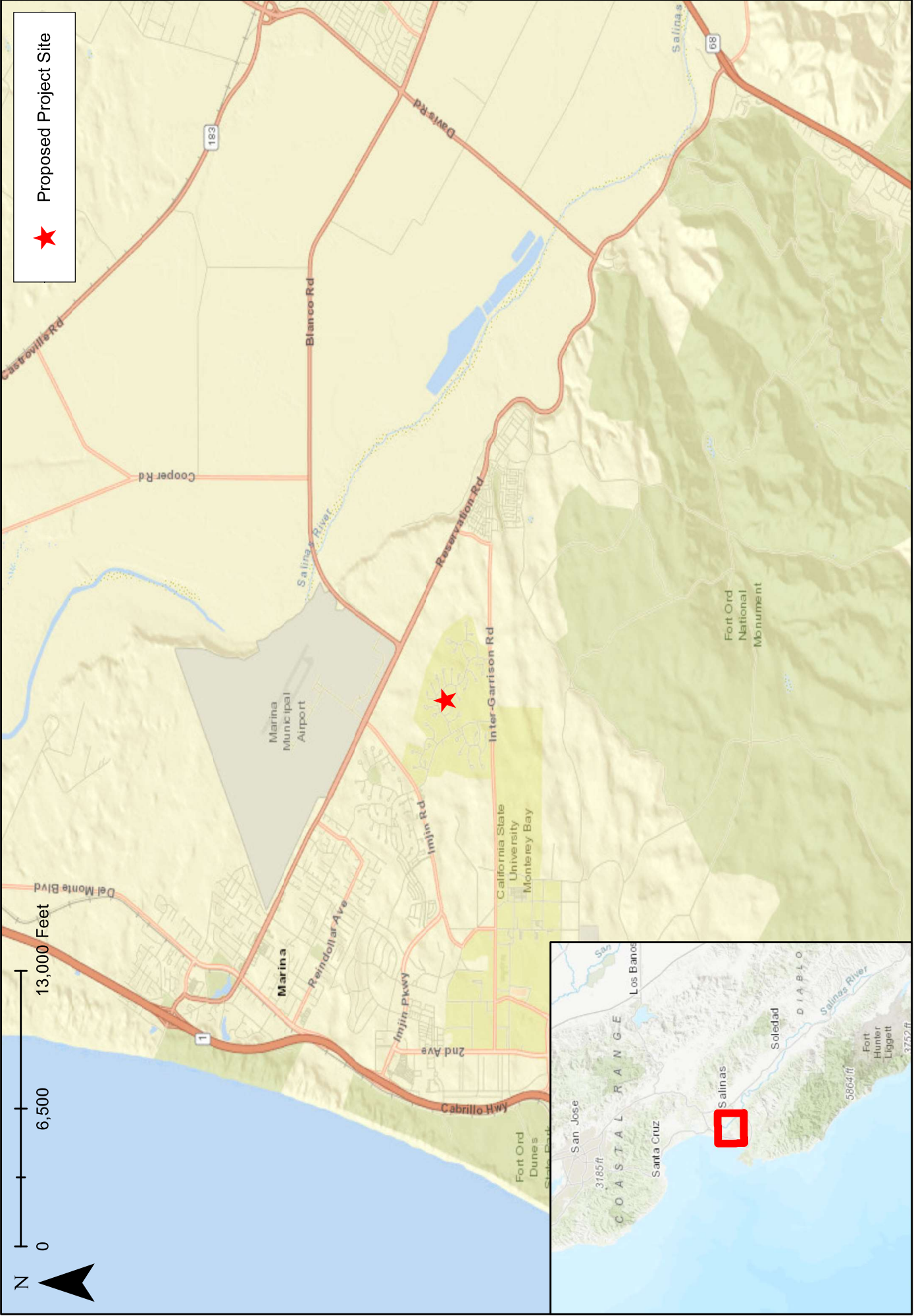
Project Location

The East Campus Housing Area at CSUMB is located in unincorporated Monterey, County, California on Assessor Parcel Number (APN) 031-101-032-000 (**Figure 1** and **Figure 2**). The proposed project would run along Schoonover Road and the various courts stemming from it, northwest from the intersection of Schoonover Road and Abrams Drive, terminating just before the intersection of Schoonover Road and Devers Court. The following streets are within the project footprint:

- Barbee Ct.
- Bundage Ct.
- Combs Ct.
- Edde Ct.
- Henson Ct.
- Holovits Ct.
- Jackson Ct.
- Schoonover Rd.
- Scott Ct.
- Sherman Ct.
- Thomas Ct.
- Warrelman Ct.
- White Ct.

Regional access to the project area is provided by State Route 1, a six-lane arterial highway located approximately three miles west of the project area, or by Reservation Road, a four-lane arterial road approximately one mile east of the area. Local access to the project area is provided by Abrams Drive, Imjin Parkway, and Inter-Garrison Road, which are two-lane collectors located north and south and three miles east of State Route 1.

The project area is developed and predominately disturbed, however, several natural communities including ruderal/disturbed, maritime chaparral, coast live oak woodland, and coastal scrub occur within and adjacent to the project area.



★ Proposed Project Site

N
0
6,500
13,000 Feet

Figure
1

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Planning and Environmental Consulting



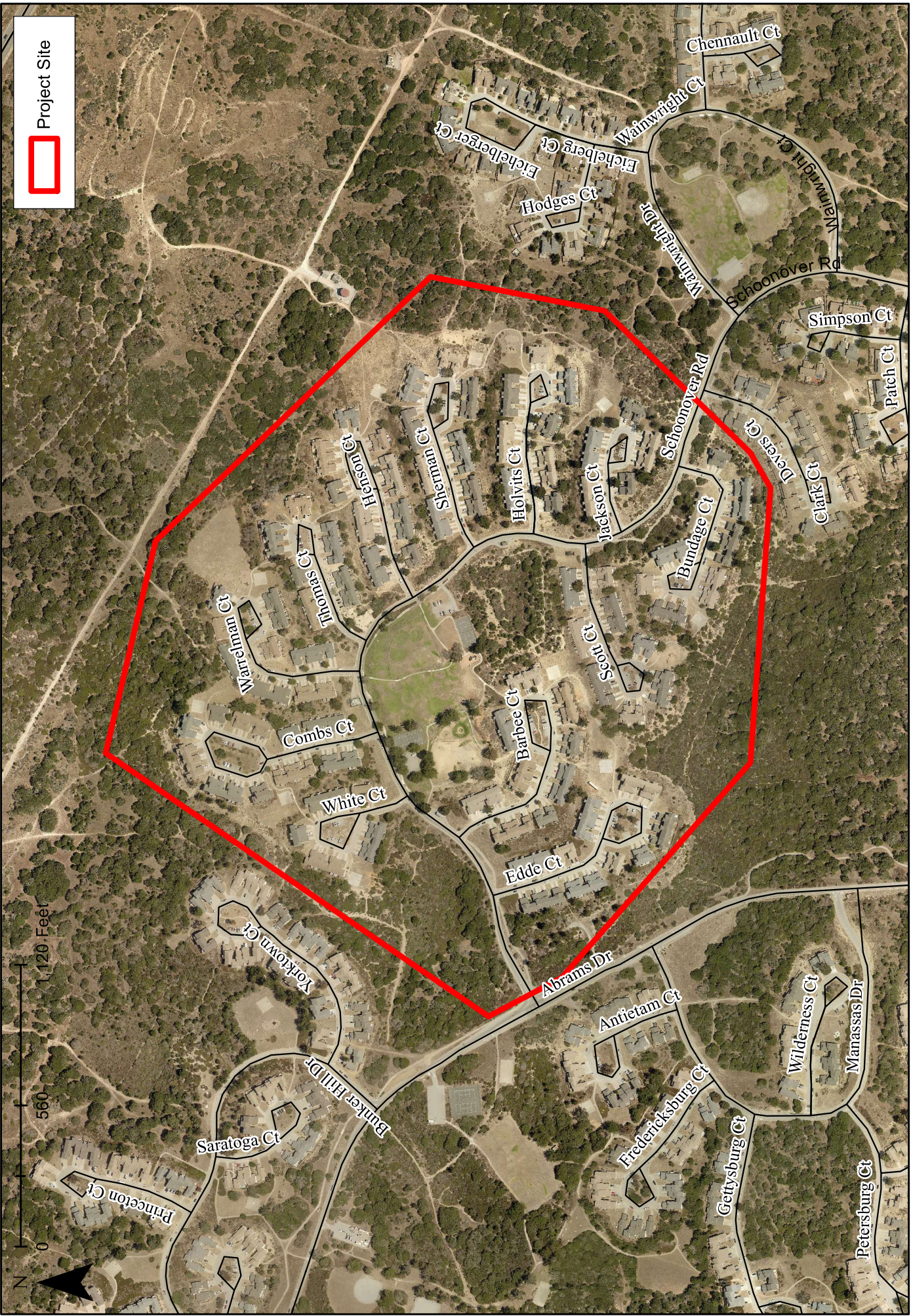
Date

8/11/2022

Scale

1 in = 6,000 ft

Regional Map



 Project Site

Project Vicinity

Date: 8/11/2022
Scale: 1 in = 500 ft

 **Denise Duffy & Associates, Inc.**
Planning and Environmental Consulting

Figure **2**

Project Description

The proposed project consists of the replacement of approximately 9,816 feet (ft) of gas distribution main and 93 existing gas services of various diameters. More specifically, PG&E would replace Aldyl “A” plastic gas pipeline with new polyethylene plastic pipeline for the improved operation and maintenance of natural gas facilities within the existing East Campus housing are.

Construction

The proposed project would utilize trenchless horizontal directional drilling (HDD) and open trenching methods to access, cut, purge, seal, and replace the gas lines. The HDD method would result in approximately 1,196 square feet (sf), or 0.027 acres, of ground disturbance. The open trench method would result in approximately 1,024 sf, or 0.024 acres, of ground disturbance. In total, the proposed project would result in approximately 2,220 sf, or 0.051 acres, of ground disturbance (**Figure 3**).

The proposed project would cut, purge, and seal 2,000-foot sections of gas line main at every intersection and at the end of cul-de-sacs at the streets described above. Work activities would occur within the 10-foot public utility easement (PUE) (2214-02-0474 (DACA 584) Fort Ord Master Easement) around the existing gas lines. Existing services would be cut at the existing main and at the end, purged, and sealed. All old rises would be cut below-grade and sealed. Any spoils from the excavation activities would be hauled to an off-site PG&E spoils facility. All excavation areas would be covered by metal plating when work is not occurring, and the plate zones will be delineated with safety cones to protect the public. Any needed street or property repairs will be made as part of the restoration process. The new pipeline would be installed adjacent to the existing pipeline to allow construction work to proceed without stopping the flow of natural gas through the original pipeline.¹ The new gas main would maintain a 3 ft clearance when being installed next to a 3rd party wet utility (such as a water line).²

Access to the site would be via Abrams Drive and Schoonover Road. The proposed project would utilize a 1,600 sf (40 ft x 40 ft) area at either Lot A or Lot B (**Figure 4**) along Abrams Drive as a staging yard. This section of the parking lot would be fenced off and used for materials and equipment storage (backhoe, pipe fittings, wash station, trench plates, etc.). Crew parking would be accommodated using the traffic-controlled work area as well. Equipment expected to be used for construction of the proposed project includes: a backhoe/excavator, vacuum truck, directional drill rig, small loader, dump truck, on-site inspector’s vehicle, 2 to 3 crew vehicles, and occasional miscellaneous vehicles (construction manager, contractor superintendent, engineers, project manager, etc.).

Construction Schedule

Gas main and service replacement activities are expected to take approximately 3-4 months each, and construction is expected to occur between January 23, 2023 and September 15, 2023 with service work and full restoration completed by the end of 2023. Activities would occur after the senescence (aging) of annual plants to minimize impacts on plants and preserve seeds. The work activities would typically occur Monday through Friday from 8:00 am to 4:30 pm with the potential for overtime. Prior to the start of activities, PG&E would contact homeowners. While not planned, homeowners and residents within the project area could experience temporary impacts to parking and driveway access, however; onsite crews would be available to help facilitate access during project construction.

¹ PG&E does not anticipate any gas service outages. Crew will be onsite to address outages if they occur, and homeowners will be notified in advance of planned, and necessary, outages.

² All utilities have been located on-site, there is room to accomplish this and stay within the existing easement.

Project Goals and Objectives

The goal and objective of the proposed project are to reduce threats to the natural gas distribution system's integrity and improve public safety and system reliability.

Source: PG&E

Order Test Supplement Name	Order Number	Date	LAN ID
Company Name (if third party)			
Make, Make and Serial No. of Pressure Gauge			
Size (in)	Length (ft)	Description (Type, Date, Manufacturer, Date, Grade)	Start Date
End Date	Test Pressure (psig)		
Group Title, Diagram, or other Paper not part of above			
Location	Test Supplement LAN ID	Date	Test Pressure (psig)

1. Round to the nearest tenth of inch.

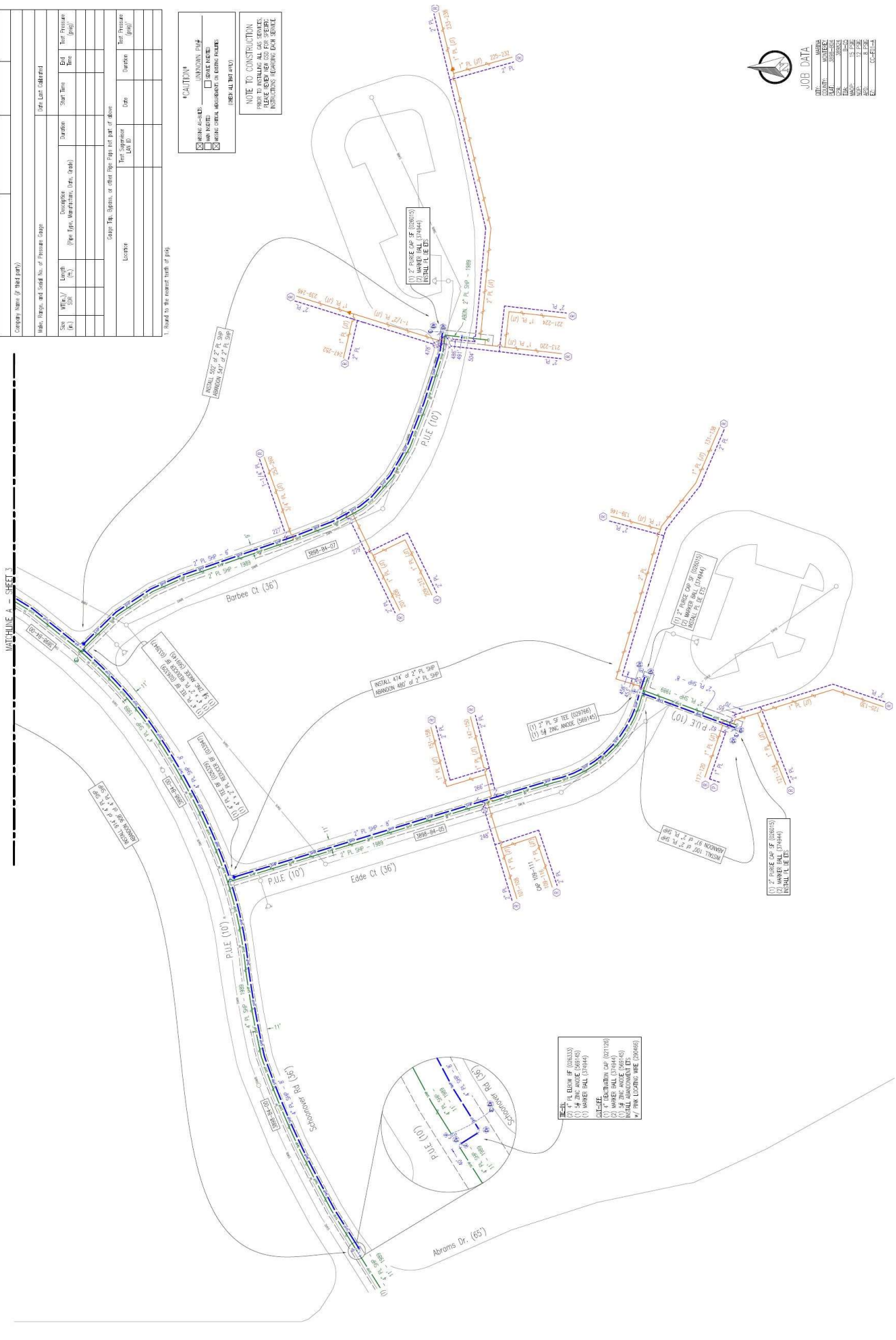
CAUTION

MAKE AS-BUILT
 MAKE AS-IS
 MAKE AS-TESTED
 MAKE AS-CONSTRUCTION DRAWING
 MAKE AS-OTHER
 MAKE AS-OTHER (SPEC. AT THE END)

NOTE TO CONSTRUCTION:
 PRIOR TO INSTALLING ALL GAS SERVICES, VERIFY ALL DIMENSIONS AND LOCATIONS INDICATED REGARDING EACH SERVICE.

JOB DATA

DATE:	08/11/2022
SCALE:	N/A
PROJECT:	PG&E
CLIENT:	PG&E
DESIGNER:	DD&A
CHECKER:	DD&A
DATE:	08/11/2022
SCALE:	N/A
PROJECT:	PG&E
CLIENT:	PG&E
DESIGNER:	DD&A
CHECKER:	DD&A
DATE:	08/11/2022



Site Plan

Date
08/11/2022

Scale
N/A

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Figure
3a



Staging Yards



Title

Date

6/15/2023

Scale

1 in = 300 ft



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Figure

4

EXEMPT STATUS

Statutory exemptions are projects specifically excluded from California Environmental Quality Act (CEQA) consideration as defined by the State Legislature and delineated in PRC Section 21080. The project qualifies for a CEQA Statutory Exemption under Article 18, *Section 15269(b) and (c) Emergency Projects*.

In addition, the project would qualify for a Class 1 Categorical Exemption under Article 19 (Categorical Exemptions) *15301(b) and (d) Existing Facilities*, Class 2 under Article 19 (Categorical Exemptions) *15302(c) Replacement or Reconstruction*, and a Class 4 Categorical Exemption under Article 19 (Categorical Exemptions) *15304(f) Minor Alterations to Land* of the State CEQA Guidelines.

Finally, under CEQA Guidelines section 15061(b)(3), Review for Exemption (14 CCR Sec. 15061(b)(3)), activities are exempt from, and otherwise not subject to, CEQA under the “common sense” exemption where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. Therefore, the proposed project also qualifies under the “common sense” exemption.

Statutory Exemption Analysis

Reason Why the Project is Statutorily Exempt

Article 18 (Statutory Exemptions) of the State CEQA Guidelines lists types of projects that are exempt from the requirements of CEQA. This section provides an analysis of why this project meets the conditions for a *Section 15269 Emergency Projects* statutory exemption. Section 15269(b) and (c) consists of:

(b) Emergency repairs to publicly or privately owned service facilities necessary to maintain services essential to the public health, safety, or welfare. Emergency repairs include those that require a reasonable amount of planning to address an anticipated emergency.

(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.³

Section 15269(b) and (c) of the CEQA Guidelines specifies that the CEQA statutory exemption for emergency projects exempts specific actions necessary to conduct emergency repairs and specific actions necessary to prevent or mitigate an emergency.

The proposed project meets these conditions. The proposed project would be statutorily exempt from environmental review under CEQA because it consists of emergency repairs to the area’s gas distribution systems. The proposed project would reduce threats to the distribution system’s integrity and improve public safety and system reliability. In October 2011, PG&E made a commitment to begin replacing more than 1,200 miles of plastic gas piping, manufactured by DuPont before 1973 under the name Aldyl-A, across California due to its history of cracking and failing. This replacement program was prompted after a leaky plastic gas pipe sparked a fire at a Cupertino, CA condominium complex. The project involves

³ CCR Title 14, Division 6, Chapter 3, Article 18. *Statutory Exemptions, Section 15269 Emergency Projects*. Available at: <https://www.law.cornell.edu/regulations/california/14-CCR-15269>

emergency repairs to publicly owned service facilities necessary to maintain service essential to public health, safety, or welfare, which is necessary to prevent and mitigate an emergency.

A statutory exemption applies to any given project that falls under its definition, regardless of the project's potential impacts to the environment. However, it is important to note that any CEQA exemption applies only to CEQA and not any other state, local, or federal laws that may be applicable to a proposed project, including, but not limited, to the California Endangered Species Act (CESA) and federal Endangered Species Act (ESA). A Biological Resources Report was prepared to describe the existing biological resources within and adjacent to the project area, including any special-status species or sensitive habitats which occur or have the potential to occur within and adjacent to the area (**Attachment B**). The report also assesses the potential impacts to sensitive biological resources that may result from implementation of the proposed project. The analysis determined that potential impacts to sensitive biological resources would be less than significant with implementation of required measures from the CSUMB Master Plan Environmental Impact Report (EIR) and Mitigation Monitoring and Reporting Program (MMRP), PG&E's Multiple Region Operation and Maintenance Habitat Conservation Plan (MRHCP), and the standard construction best management practices recommended in the report would reduce potential impacts to sensitive biological resources. As a result, potentially significant impacts to sensitive biological resources will be avoided and minimized with implementation of the required measures and any incidental take of listed species under CESA and ESA will be avoided. No other potentially significant impacts are anticipated as a result of project implementation.

Categorical Exemption Analysis

Reason Why the Project is Categorically Exempt

Article 19 (Categorical Exemptions) of the State CEQA Guidelines lists classes of projects that are exempt to the requirements of CEQA. This section provides an analysis of why this project meets the conditions for *Section 15301(b) and (d) Existing Facilities*, *Section 15302(c) Replacement or Reconstruction*, and *Section 15304(f) Minor Alterations to Land* exemptions along with the reasons why none of the possible exceptions to Categorical Exemptions, found in *Section 15300.2 Exceptions*, apply to this project.

Section 15301(b) and (d) Existing Facilities consists of:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or other minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

*(b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services."*⁴

(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood.

⁴ CCR Title 14, Division 6, Chapter 3, Article 19. Categorical Exemptions, Section 15301 Existing Facilities. Available at: <https://govt.westlaw.com/calregs/Document/18CD1777B5B4D11EC976B000D3A7C4BC3>

Section 15302(c) Replacement or Reconstruction consists of:

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:

(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

Section 15304(f) Minor Alterations of Land consists of:

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

(f) minor trenching and backfilling where the surface is restored.

The proposed project meets these conditions. The proposed project would be categorically exempt from environmental review under CEQA as it consists of the replacement of existing natural gas utilities to improve the system's integrity and reliability and to improve public safety. The proposed project would be categorically exempt from environmental review under CEQA because it involves the repair and maintenance of existing publicly-owned facilities to provide natural gas and restoration of deteriorated facilities to meet current standards of public health and safety. The proposed project would not involve the expansion of use of any existing facilities. The proposed project involves the replacement or reconstruction of existing facilities where the new facilities will be located on the same site as the facility replaced and will have substantially the same purpose and capacity of the facility replaced. The project would replace and reconstruct existing gas lines involving negligible or no expansion of capacity. The proposed project would not involve the removal of any healthy, mature, scenic trees. The proposed project would require minor alterations to land. The HDD method would result in approximately 1,196 square feet (sf) (0.027 acre) of ground disturbance and the open trench method would result in approximately 1,024 sf (0.024 acre) of ground disturbance, resulting in a total area of approximately 2,220 sf (0.051 acre) of ground disturbance. The implementation of the identified avoidance and minimization measures identified in the Biological Resources Report and PG&E's MRHCP would avoid and reduce potential impacts to sensitive biological species, and would not result in any take of listed species.

Conclusion

Under CEQA Guidelines section 15061(b)(3), Review for Exemption (14 CCR Sec. 15061(b)(3)), activities are exempt from, and otherwise not subject to, CEQA under the "common sense" exemption where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. As analyzed above, the proposed project would not result in any significant effects on the environment. Therefore, in addition to the statutory and categorical exemptions identified above, qualifies under the "common sense" exemption.

As described above, the proposed project would not result in a significant impact to environmental resources. Therefore, the project is eligible for the identified categorical exemptions under CEQA.

Exceptions to Categorical Exemption Analysis

CEQA Guidelines Section 15300.2 identifies exceptions that override a lead agency's ability to use a categorical exemption. These exceptions are listed below, including documentation as to why each exception does not apply to the proposed project.

Location

Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

This exception does not apply to the proposed project. A Biological Resources Report was prepared to describe the existing biological resources within and adjacent to the project area, including any special-status species or sensitive habitats which occur or have the potential to occur within and adjacent to the area (**Attachment B**). The report also assesses the potential impacts to sensitive biological resources that may result from the implementation of the proposed project and recommends appropriate avoidance and minimization measures necessary to reduce those impacts to a less-than-significant level in accordance with CEQA. The analysis determined that potential impacts to sensitive biological resources would be less than significant with implementation of required measures from the CSUMB Master Plan Environmental Impact Report (EIR) and Mitigation Monitoring and Reporting Program (MMRP), PG&E's Multiple Region Operation and Maintenance Habitat Conservation Plan (MRHCP), and the standard construction best management practices recommended in the report would reduce potential impacts to sensitive biological resources. As a result, potentially significant impacts to sensitive biological resources will be avoided and minimized with implementation of the required measures and any incidental take of listed species under CESA and ESA will be avoided. No other potentially significant impacts are anticipated as a result of project implementation.

Cumulative Impact

All exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time, is significant.

This exception does not apply to the proposed project. As discussed above, the proposed project would implement avoidance and minimization to ensure impacts remain less than significant. There are no other projects of the same type proposed in the CSUMB East Campus Housing Area, and, therefore, no cumulative impacts would occur.

Significant Effect

A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

This exception does not apply to the proposed project. There are no unusual circumstances related to the project that would create a reasonable possibility of significant effects to the environment. As described above, the proposed project would implement avoidance and minimization measures to ensure impacts remain less than significant.

Scenic Highways

A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway. This does not apply to improvements which are required as mitigation by and adopted negative declaration or certified EIR.

This exception does not apply to the proposed project. According to the California Scenic Highway Mapping System, the closest eligible State scenic highway is State Route 1, approximately 2.75 miles west of the project site. Because the proposed project would replace utility lines in residential areas and on local roads and outside of the proposed scenic highway designation, there would be no damage to scenic resources due to project implementation. No impact would occur.

Hazardous Waste Sites

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to §65962.5 of the Government Code.

This exception does not apply to the proposed project. The proposed project is not located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Historical Resources

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

This exception does not apply to the proposed project. The proposed project would remain on or adjacent to existing roads and residential structures. Natural gas utility line replacement activities would not impact any structures. Therefore, no impact to historical structures would occur.

References

California Department of Transportation. 2023. California State Scenic Highway Mapping System. Accessible at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed June 2023.

California Environmental Protection Agency. 2023. Cortese List Data Resources. Accessible at: <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed June 2023.

Denise Duffy & Associates, Inc. 2023. CSUMB East Campus Gas Distribution System Capacity and Reliability Project Biological Resources Report.