

**Categorical Exclusion Checklist** 

# **PG&E Line 114 Safety Enhancement**

#### CEC-14-016

Prepared by:

Ben Lawrence Natural Resources Specialist South-Central California Area Office

Concurred by:

Concurred by:

Concurred by:

<u>See Attachment C</u> Archaeologist/Architectural Historian Mid-Pacific Regional Office

<u>See Attachment D</u> Native American Affairs Specialist Mid-Pacific Regional Office

Shauna McDonald Wildlife Biologist South-Central California Area Office

Concurred by:

Approved by:

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Rain Emerson Supervisory Natural Resources Specialist South-Central California Area Office

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for

Michael Jackson Area Manager South-Central California Area Office

Date: <u>1-18-14</u>

Date: See Attachment C

Date: See Attachment D

Date:

Date:

Date: 9/24/2014



U.S. Department of the Interior Bureau of Reclamation South-Central California Area Office

# Background

Pacific Gas & Electric Company (PG&E) has established a pipeline replacement and repair program to address aging high-pressure gas line infrastructure. One of the segments of highpressure natural gas transmission line identified for replacement is located between the Brentwood and Antioch Gas Terminals in eastern Contra Costa County, California. Over the last three years, PG&E has replaced six of the eight miles of this pipeline, known as Line 114, between the two terminals. The last two miles to be replaced are located along Neroly Road, near the California 4 Bypass in Oakley (see Figure 1).

The existing pipe has a crossing above the Contra Costa Canal (Canal) near Milepost 6.68. PG&E proposes to replace this final section of pipe with a buried section underneath the Canal. It would also cross underneath an untreated water line which connects the Los Vaqueros Pipeline system to the Randall Bold Water Treatment Plant, and Contra Costa Water District's (Contra Costa WD's) multipurpose pipeline which supplies the cities of Antioch, Pittsburg, Bay Point and Concord and in an emergency event serves as a backup water delivery facility (see Attachment A). PG&E evaluated alternative routes adjacent to the existing pipeline. However, due to constraints with other utilities in the same corridor, crossing the Canal would be required regardless of the route chosen.

PG&E has already begun replacement of portions of the pipeline outside of the Canal right of way, but Contra Costa WD has advised PG&E not to begin preparatory work in this location (such as constructing boring pits) until Reclamation has provided clearance for the crossing.

## **Purpose and Need for Action**

PG&E has identified a need to replace the high-pressure gas transmission line 114. The purpose of the Proposed Action is to increase reliability of the pipeline system and allow for inline inspection of the pipe. The action also reduces the risk of structural failure and associated injury and/or property damage to nearby urban areas in Oakley and Antioch. PG&E must relocate the line by the end of 2014 in order to meet commitments to the California Public Utility Commission.



Figure 1 - PG&E Line 114 Location

# **Proposed Action**

Reclamation proposes to issue a land use authorization to PG&E for construction, operation and maintenance of a new gas line, in perpetuity. The proposed work is shown in Attachment B, and described below.

The new line would cross under the Canal near Milepost 6.68, an untreated water line which connects the Los Vaqueros Pipeline system to the Randall Bold Water Treatment Plant, and Contra Costa WD's multipurpose pipeline. The new line would be a 24-inch high-pressure gas line, installed by horizontal directional drilling to a depth of at least 25 feet beneath the Canal.

The entry point would be located on private property north of the Canal. At that location, there would be a work area consisting of a 50-foot permanent easement and temporary easements to the east (174 feet by 42 feet) and west (174 feet by 90 feet). The exit point would be located near Laurel Road, with a work area approximately 200 feet by 45 feet, partially overlapping with the existing easement. The total length of the directional boring would be approximately 1,500 feet (See Attachment B for more detail). Following installation of the new gas line, Reclamation and Contra Costa WD will require removal of the old line.

Contra Costa WD requested that PG&E include specific shut off valves located in close proximity to its critical water facilities so that Line 114 could be quickly isolated in the event of gas pipeline rupture. PG&E stated that additional shut off valves in close proximity to Contra Costa WD's critical water facilities are not necessary because the existing automated valves in Antioch and Brentwood provide adequate safety for Contra Costa WD's water system, meet federal requirements for distances between valves on gas pipelines, and allow for Line 114 to be quickly isolated in the event of a gas line disruption. In addition, there is a manual valve at Grant road south of the Canal that can be exercised to shut down Line 114 in the event of a disruption. PG&E Engineers stated that in the event of an emergency that Line 114 could be shut down within 30 minutes and this would minimize potential damage to Contra Costa WD critical water facilities. Based on this explanation by PG&E that the combination of automatic valves, manual valves and incident response procedures meet safety needs, the requested shutoff valves in close proximity to Contra Costa WD facilities will not be installed. Contra Costa WD and PG&E will continue to coordinate on emergency response measures and plans.

#### **Environmental Commitments**

PG&E would implement the following environmental commitments to avoid any environmental consequences associated with the Proposed Action (Table 1). Environmental consequences for resource areas assume the measures specified would be fully implemented.

Resource	Protection Measure		
Biological Resources	PG&E shall install boundary flagging (t-posts and rope or fencing) to mark and delineate environmentally sensitive areas. This area would be off limits to construction (a "no work zone" (buffer) around sensitive areas).		
Biological Resources	A pre-construction survey for western burrowing owls shall occur within 24 hours prior to work. The site will be checked to ensure that occupied burrows, if any, remain consistent with previous surveys.		
Biological Resources	Pipes, and culverts greater than four inches in diameter shall be covered and/or stored so as to prevent wildlife from taking refuge if possible. If this is not possible, the PG&E and Reclamation biologists shall be consulted prior to implementation to develop a storage alternative. An inspection shall occur prior to moving the materials. Given the presence of burrowing owls in the project area, it would be advised to cap pipes at the end of each day to prevent owls from nesting or making other use of the pipes.		
Biological Resources	All excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials. Before such holes or trenches are filled, they shall be inspected prior to filling.		
Biological Resources	Ground squirrel burrows shall be flagged for avoidance. If they cannot be avoided, Reclamation and PG&E biologists shall be consulted to determine appropriate action.		

Table 1 Environmental Commitments

Resource	Protection Measure
Biological Resources	A biologist shall be present on site full-time for the first week of work. After this time, a biologist may be on site full or part-time to spot check the site. This is to ensure measures are in place, ensure no new owls have moved onto the site, ensure the t-posts and rope are holding up, and to document existing conditions or bring items to the attention of the Reclamation biologist, and PG&E biologist and land planner.
Biological Resources	Prior to starting any work, all PG&E employees and contractors shall receive training on environmental and cultural conditions and requirements applicable to this job. If additional crewmembers arrive later in the job, they must go through the training prior to beginning work. Training shall include a discussion of the avoidance and minimization measures that must be implemented as presented. Training shall include information on the federal and state Endangered Species Acts and the consequences of noncompliance with these acts. Workers shall be informed about the presence, life history and habitat requirements of all special- status species, including Swainson's hawk and other nesting birds that have the potential to be affected by the project. Training shall also include information on state and federal laws protecting nesting birds, wetlands and other water resources. Construction crews shall be provided with an educational brochure that includes color photos of sensitive species and a discussion of avoidance and minimization measures that must be implemented.
Biological Resources	Vehicles and equipment shall be parked only on pavement, existing roads, and previously disturbed areas or access roads identified on the final plans.
Biological Resources	Trash dumping, firearms, open fires (such as barbecues) that are not required by the activity, hunting, and pets shall be prohibited at all work locations and access roads.
Biological Resources	Stationary equipment (e.g. pumps, generators, compressors, lights) shall be positioned over secondary containment.
Biological Resources	All food scraps, wrappers, food containers, cans, bottles and other trash from the work area must be disposed in closed trash containers. Trash must be removed completely from the work area at the end of each working day.
Biological Resources	Tanks must be positioned over drip or spill protection.
Biological Resources	Stockpiling of material shall not be allowed outside of the established work area shown on the approved Issued for Construction drawings.
Biological Resources	Any work, road widening, staging or access outside of the areas shown on the Issued For Construction drawings shall require prior approval.
Biological Resources	Any tree removal, pruning, or work within the drip line of trees other than in paved areas must be reviewed, approved, and conducted by an arborist or their designee, as approved by Reclamation and PG&E. Tree removal must be conducted outside of the bird nesting season to the extent possible. If this is not feasible, a preconstruction survey for active nests must be performed prior to tree removal. If an active nest is observed in the tree, the tree shall not be removed until the bird has finished nesting. The Contractor shall notify arborist a minimum of three business days prior to requiring the arborist's services.
Biological Resources	To prevent entrapment of sensitive species, all open holes, steep-walled holes, or trenches more than two feet deep shall be covered at the close of each work day by plywood or similar materials, with all voids beneath the plates filled, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. Escape ramps must be set at an angle less than 33 degrees to ensure wildlife can climb out.
Biological Resources	A speed limit of 15 mph shall be enforced onsite where safe to do so.
Biological Resources	No plastic monofilament shall be utilized on site.
Biological Resources	If grass located near work areas would present a spark risk to welders, the grass may be mowed or trimmed. Prior to trimming, a preconstruction survey for burrowing owls shall be conducted within 24 hours prior to the vegetation removal. A biologist shall be on site for any grass cutting activities.
Biological Resources	If the Contra Costa Fire Marshal mandates PG&E to disk the parcel under its lease during the fire season, PG&E shall consult with Reclamation and California Department of Fish and Wildlife, in concert with the Fire Marshal, on appropriate methods to minimize impacts to any owls present.

Resource	Protection Measure		
Biological Resources	In the event work activity at this location ceases for longer than one week during the planned work window, additional burrowing owl survey(s) shall be performed.		
Biological Resources	No fumigation shall be used. No poison or treated grain shall be used.		
Biological Resources	Temporarily disturbed areas at the laydown site shall be restored to previous conditions.		
Hazardous Materials	All hazardous materials and wastes generated by the project will be managed according to regulations and best management practices.		
Cultural Resources	PG&E shall implement their Best Management Practices with respect to unanticipated discoveries.		
Cultural Resources	Should cultural resources be encountered during project activities, all work will be suspended in the vicinity of the resource. The PG&E cultural resources specialist will be contacted, who in turn will contact Reclamation to coordinate the proper response.		
Contra Costa Canal	The existing pipeline shall be removed from the Canal and right of way no later than one year from completion of the replacement project.		
Contra Costa Canal	The PG&E Transmission and Regulation group in charge of the protocol for emergency response will develop a specific emergency response plan for this canal crossing with Contra Costa WD and Reclamation prior to the pipeline being filled with gas for the first time.		

# **Exclusion Category**

516 DM 14.5 paragraph C (3): *Minor construction activities associated with authorized projects which correct unsatisfactory environmental conditions or which merely augment or supplement, or are enclosed within existing facilities.* 

516 DM 14.5 paragraph D (10): Issuance of permits, licenses, easements, and crossing agreements which provide right-of-way over Bureau lands where the action does not allow for or lead to a major public or private action.

# Evaluation of Criteria for Categorical Exclusion:

- 1. This action would have a significant effect on the quality of the human environment (40 CFR 1502.3).
- 2. This action would have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA Section 102(2)(E) and 43 CFR 46.215(c)).
- 3. This action would have significant impacts on public health or safety (43 CFR 46.215(a)).
- 4. This action would have significant impacts on such natural resources and unique geographical characteristics as historic or cultural resources; parks, recreation, and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (43 CFR 46.215 (b)).
- 5. This action would have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks (43 CFR 46.215(d)).
- This action would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (43 CFR 46.215 (e)).
- 7. This action would have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)).
- This action would have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)).

No ☑	Uncertain	Yes
No ☑	Uncertain	Yes

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No	Uncertain	Yes
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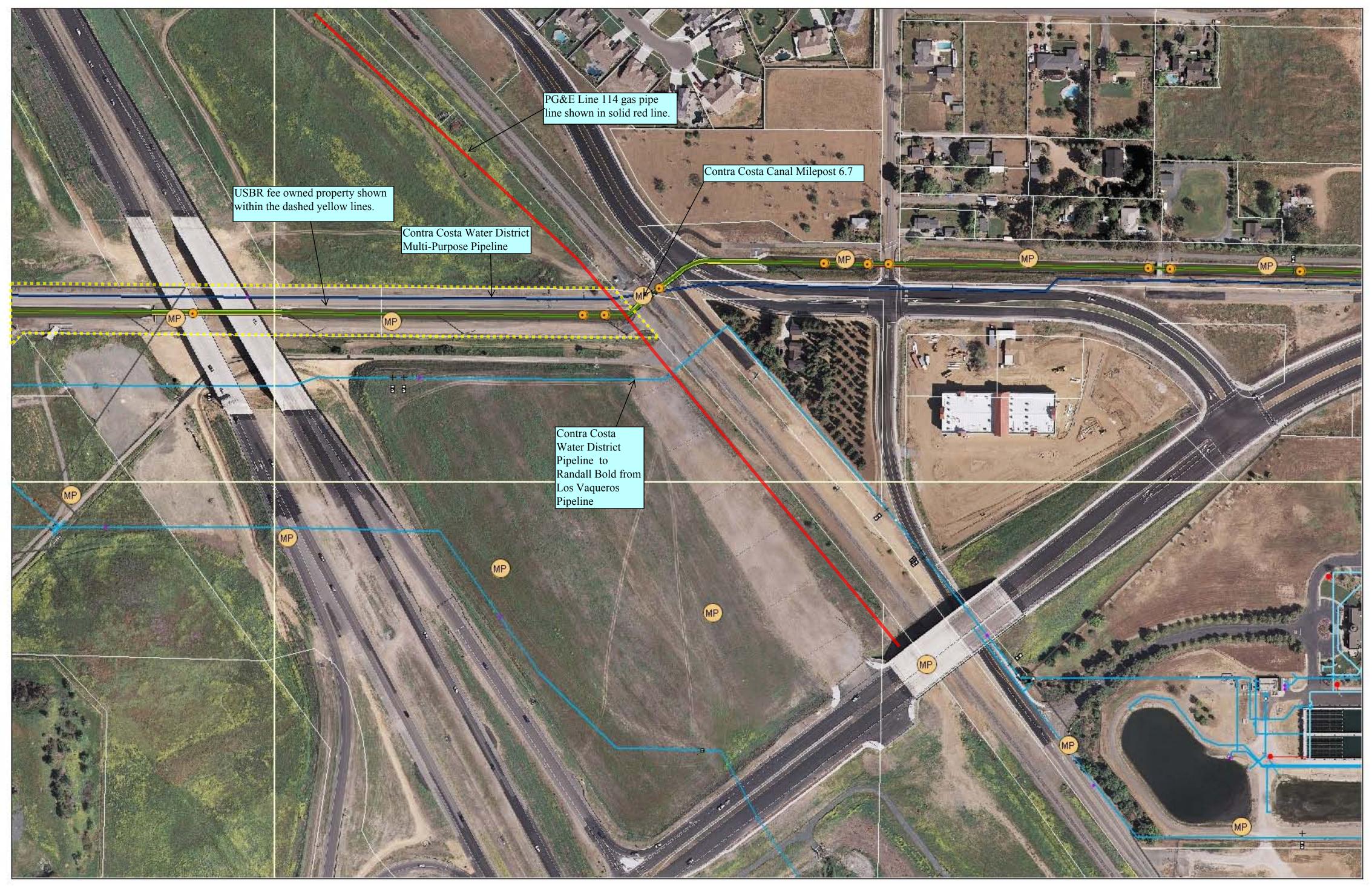
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No 1	Uncertain	Yes
No 1	Uncertain	Yes

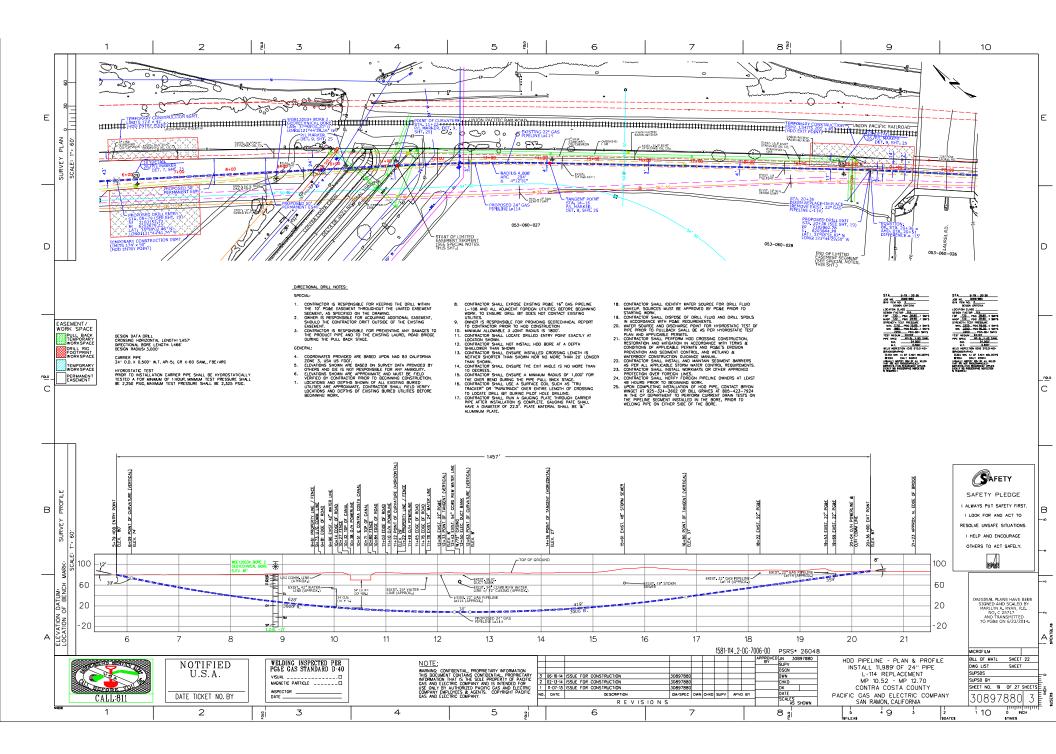
9.	This action would have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species (43 CFR 46.215 (h)).	No 1	Uncertain	Yes
10.	This action would violate a Federal, tribal, State, or local law or requirement imposed for protection of the environment (43 CFR 46.215 (i)).	No 1	Uncertain	Yes
11.	This action would affect ITAs (512 DM 2, Policy Memorandum dated December 15, 1993).	No ☑	Uncertain	Yes □
12.	This action would have a disproportionately high and adverse effect on low income or minority populations (EO 12898) (43 CFR 46.215 (j)).	No 1	Uncertain	Yes
13.	This action would limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007, 43 CFR 46.215 (k), and 512 DM 3)).	No 1	Uncertain	Yes
14.	This action would contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act,	No 1	Uncertain	Yes

EO 13112, and 43 CFR 46.215 (1)).

# Attachment A General Pipeline Layout (Graphic by PG&E)



# Attachment B Preliminary Plan and Profile



### Attachment C Cultural Resources Determination

#### CULTURAL RESOURCE COMPLIANCE Mid-Pacific Region Division of Environmental Affairs Cultural Resources Branch

#### MP-153 Tracking Number: 14-CCAO-189

Project Name: PG&E Line 114 Safety Enhancement Contra Costa County, California

NEPA Document: CEC-14-016

Project Manager/NEPA Contact: Ben Lawrence

MP 153 Cultural Resources Reviewer: Mark Carper

Determination: No Historic Properties Affected

#### Date: 9/18/2014

This proposed undertaking by Reclamation is to issue a land use authorization for the proposed PG&E Line 114 Safety Enhancement Project in eastern Contra Costa County Reclamation's issuance of the land use authorization and use of Federal funding constitute an undertaking as defined in Section 301(7) of the NHPA (16 U.S.C. 470), as amended, and requires compliance with Section 106 of the NHPA.

The proposed project will include the boring under the Reclamation owned Contra Costa Canal (CCC) at Milepost 6.2. PG&E has established a pipeline replacement and repair program to address aging highpressure gas line infrastructure. One of the segments of high-pressure gas line identified for replacement is located between the Brentwood and Antioch Gas Terminals in eastern Contra Costa County. Over the last three years, PG&E has replaced six of the eight miles of pipeline, known as Line 114, between the two terminals. The current undertaking involves the described segment in this submission only. Specifically, the component of the project under Federal review, and therefore this Federal undertaking, is a 1,500 foot directional drilling effort from north of Laurel Road to north of the CCC within Reclamation's ROW and the removal of existing pipeline. The directional drilling includes the entry and exit bore bell holes, the adjacent work space, and the bore itself. The bell holes will be 6x6-feet and 5-feet deep. The northern work space will measure approximately 130 x 175 feet and the southern will be approximately 100 x 175 feet. The drill hole will support the placement of a 24-inch diameter high-pressure gas line.

#### CULTURAL RESOURCE COMPLIANCE Mid-Pacific Region Division of Environmental Affairs Cultural Resources Branch

The drill hole will avoid the CCC by passing at least 25-feet below its base. All slurry from the directional bore will be hauled off site to Potrero Hills Landfill in Suisun City, CA.

In an effort to identify potential historic properties within the APE, PG&E contracted Condor County Consulting to conduct a record search and pedestrian survey for part of a broader project which includes the replacement for the entire line 114 and line 191. The subject APE is encapsulated by this broader project survey. In addition, PG&E archaeologist Jennifer Darcangelo conducted a pedestrian survey for the proposed work area for this undertaking to ensure coverage of the currently proposed APE. Ms. Darcangelo's findings were relayed verbally to Reclamation. Specifically, the eastern portion of the work areas were observed as consisting of fill from previous construction activities, with the remainder of the field deep disced from farming activities. The investigations did not identify any cultural resources within the APE.

To address Reclamation's concerns regarding the potential identification of buried cultural resources in the APE, PG&E prepared a supplemental report as well as a buried site sensitivity map (Figure 3). The supplemental report and the sensitivity map cover a longer section of Line 114 that includes the current APE. Based on the geoarchaeological assessment in the supplemental report the APE varies between moderate and high sensitivity for buried site potential. Ms. Darcangelo reported soil disturbances and deep discing agricultural activities. Should shallow buried sites exist in the APE, it is expected that vertical migration of artifacts would have been identified at the surface in some capacity. None were found during the surveys. Due to these considerations, Reclamation finds there to be a low expectation for buried archaeological resources within the APE at least to the 5-foot depth of the proposed bore bell holes, where such resources could potentially be noted during directional drilling activities.

During implementation of the proposed project, PG&E will implement their Best Management Practices in regards to unanticipated discoveries. Should cultural resources be encountered during project activities, all work will be suspended in the vicinity (approximately 100ft) of the resource and the assigned PG&E Cultural Resource Specialist will be contacted, who in turn will contact Reclamation, to coordinate the proper response. Reclamation will follow the procedures at 36 CFR § 800.13 for post-review discoveries as applicable.

#### CULTURAL RESOURCE COMPLIANCE Mid-Pacific Region Division of Environmental Affairs Cultural Resources Branch

Pursuant to 36 CFR § 800.3(f)(2) Reclamation identified the Ione Band of Miwok Indians as an Indian tribe likely to have knowledge of historic properties or attach religious and cultural significance to historic properties within the APE. Reclamation sent letters to the tribe requesting their participation in the Section 106 process and assistance in identifying sites of religious and cultural significance of historic properties pursuant to 36 CFR § 800.4(a)(4). No such sites were identified.

Reclamation initiated consultation with the California State Preservation Office (SHPO) by letter on August 27, 2014. SHPO responded by letter on September 12, 2014 concurring with Reclamation's determination of no historic properties affected by the undertaking.

After reviewing CEC-14-016, dated June 2014, I concur with item #8 which states that this action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places.

This memorandum is intended to convey the completion of the NHPA Section 106 process for this undertaking. Please retain a copy in the administrative record for this action. Should changes be made to this project, additional NHPA Section 106 review, possibly including consultation with the State Historic Preservation Officer, may be necessary. Thank you for providing the opportunity to comment.

### Attachment D Indian Trust Assets Determination



Lawrence, Benjamin <blawrence@usbr.gov>

#### **Request for Determinations**

**RIVERA, PATRICIA** <privera@usbr.gov> To: Benjamin Lawrence <blawrence@usbr.gov>

Ben,

I reviewed the proposed action to approve PG&E's proposal to replace 2-miles of 22-inch high-pressure gas line (Line 114) with a 24-inch high-pressure gas line. The existing gas line has an overhead crossing with the Contra Costa Canal (Canal) at Fairview Avenue in Brentwood. PG&E evaluated alternative routes adjacent to the existing pipeline however, due to constraints with other utilities in the same corridor, crossing the canal is required regardless of any alternative. PG&E is requesting a permit Reclamation to construct this project and to formalize an agreement in perpetuity. Contra Costa Water District (CCWD) operates and maintains the Canal under an Operations and Management Agreement with Reclamation.

The replacement gas line would be constructed via a horizontal directional drill method in order to bore under the canal. The new gas line would be at least 25-feet below the Canal. Construction would involve two bore pits dug on property outside the limits of Reclamation regulated easement.

Spoils would be tested and confirmed non-contaminated prior to backfilling. Groundwater depths would be tested prior to construction to ensure no impacts. There would be no impacts to ground water quality.

The existing vegetation is ruderal, disturbed dirt. There is also a nearby paved path for access. There are no trees or brush in the area. The site would be restored to preconstruction conditions. Staging of equipment and storage of materials would be off-site.

The proposed action does not have a potential to impact Indian Trust Assets. The nearest Indian Trust Asset is Lytton Rancheria is approximately 32 miles West of the project location. [Quoted text hidden] Tue, May 20, 2014 at 10:55 AM