Initial Study/
Mitigated Negative Declaration

Pacific Gas & Electric Company (PG&E)
Gas Line 210A and 210B
In-Line Inspection Repair Project

Prepared for

California State Water Resources Control Board

April 2009

Rev. May, 2010

Prepared by

CH2MHILL

33 New Montgomery Street, Suite 2000
San Francisco, CA 94105

NOTICE OF DETERMINATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☑ Air Quality
☑ Biological Resources	☑ Cultural Resources	☐ Geology/Soils
☑ Hazards & Hazardous Materials	☑ Hydrology/Water Quality	☐ Land Use/Planning
☐ Mineral Resources	☐ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities/Service Systems	☑ Mandatory Findings of Significance	

DETERMINATION:
On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☑ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: Doug L. Rin Date: 7-01-10

CEQA Initial Study

1.	**Project Title:**	Gas Line 210A and 210B In-Line Inspection Repair Project
2.	**Lead Agency:**	California State Water Resources Control Board
3.	**Contact Person:**	Cliff Harvey
4.	**Project Location:**	South of City of Fairfield, rural Solano County, California, between the City of Cordelia to the west and State Route (SR) 113 to the east.
5.	**Project Sponsor:**	Pacific Gas and Electric Company
6.	**General Plan Designation:**	Agriculture/Commercial
7.	**Zoning:**	M.P. 1.38 – APN: 0042-110-150 – Agricultural 160 M.P. 4.88 – APN: 0042-100-060 – Agricultural 160

8. **Description of Project:**

Project Background

The Pacific Gas and Electric Company (PG&E) proposes to inspect Gas Lines 210A and 210B in Solano County (see Figure 1; all figures are located at the end of this section, before the checklist section). Pipeline inspections are required by a federal regulation (CFR 49 Part 192 Subpart O) which states that all underground pipelines in High Consequence Areas (HCAs) must be inspected using In-line Inspection (ILI), External Corrosion Direct Assessment (ECDA), or hydrotesting by December 17, 2012. Prior to inspecting the gas lines, PG&E must replace valves and upgrade existing facilities at three locations. These pre-inspection activities, as described below, comprise the proposed Gas Line 210A and 210B In-Line Inspection Repair Project (the Project).

Project Location

The Project is located entirely in Solano County, California, between the City of Cordelia to the west and State Route (SR) 113 to the east (Figure 1). The Project Area is limited to the two locations summarized below.

Milepost (MP) 1.38 Creed Station Launch Site. This site is located in an agricultural area immediately south of Creed Road, approximately nine miles east of Suisun City and 1.5 miles west of Highway 113 (Figure 2).

MP 4.88 Valve Replacement Site. This site is located in an agricultural area immediately north of Creed Road, approximately five miles east of Suisun City and five miles west of Highway 113 (Figure 3).

Project Description

PG&E is proposing to inspect Lines 210A and 210B using In-Line Inspection methods in Spring 2010 and Spring 2011, respectively. Prior to conducting ILI of Lines 210A and 210B, PG&E must upgrade existing facilities at the three project locations listed above. The proposed Project will be implemented in two phases as described below.

Phase I – Line 210A Upgrade

In-Line Inspection of natural gas pipelines is accomplished by inserting a cylindrical inspection tool known as a "pig" into one end of the pipeline and removing it at the other end. Before Line 210A can be inspected in Spring 2010, PG&E must fabricate and install launching equipment, and replace a mainline valve at the MP 1.38. To accommodate installation of the launching equipment and mainline valve replacement at MP 1.38, PG&E must expand the existing valve lot to the west by an area of 50 ft by 190 ft. This additional area will be fenced and graveled.

Other planned work includes replacing the mainline valve and installing fence around the above ground equipment at MP 4.88. The newly fenced, 30 ft by 40 ft valve lot will be graveled.

Phase II – Line 210 B Upgrade

Line 210B runs adjacent to and is offset from Line 210A by approximately 10 feet. In-Line Inspection of Line 210B is scheduled for Spring 2011. Prior to inspecting Line 210B, PG&E will similarly fabricate and install launching equipment and replace a mainline valve at MP 1.38. All work on Line 210B at MP 1.38 will be conducted within the proposed 190 ft by 50 ft area to be expanded for the 210A upgrade.

Additionally, PG&E will replace the mainline valve at MP 4.88. This work will require temporary excavation outside of the proposed fenced and graveled valve lot.

All construction activities described above are necessary before the In-Line Inspection can occur. In very rare instances, a pig may become stuck in the pipe during inspection and the pipe must be excavated to free the pig. Therefore, there is a slight possibility of excavation at any point along the pipeline. This application/evaluation does not cover pig recovery or any construction activities other than the three locations described above that may occur during the actual In-Line Inspection.

Construction

Proposed construction activity varies at each of the three project locations. A discussion of proposed construction activities, construction methods, equipment used, duration of construction and personnel required at each of the three sites is provided below. Construction methods, equipment, duration and personnel for Line 210A and 210B at MP 1.38 and MP 4.88 will be the same.

MP 1.38 Creed Station Launch Site. A six-person crew will remove existing fencing and dig a trench approximately 125 ft long by 20 ft wide by 8 ft deep during Phase I and

another trench approximately 125 ft long by 30 ft wide by 8 ft deep during Phase II to expose the pipe on the west side of the station (Figure 2). A six-man welding crew will then fabricate and install the launching equipment along with a new main line valve. Following installation and line testing, the trench will be backfilled and recontoured to pre-existing conditions. All construction activities will be confined within the approximately 150 ft by 35 ft temporary staging area. Finally, PG&E proposes to expand Creed Station by acquiring the adjacent 50 ft by 190 ft parcel to the west. This expansion area will be graveled and fenced. Equipment used during construction at this location will include an excavator, backhoe, crane, water truck, welding trucks, generators and a frac tank used to contain liquids. Proposed work at this location is anticipated to take five weeks to complete and will include two weeks of site preparation, two weeks of welding, and one week of restoration.

MP 4.88 Valve Replacement Site. Prior to construction at MLV 4.88, PG&E will install a gate in the existing property fence to provide construction crews access to the valve lot. A six-man crew will excavate a hole approximately 40 ft long by 25 ft wide by 9 ft deep during Phase I and 40 ft long by 30 ft wide by 9 ft deep during Phase II to expose the pipe (Figure 3). A six-man welding crew will then remove the existing valve and install a new ball valve. Following installation of the new valve, the hole will be backfilled and recontoured to pre-existing conditions. An area approximately 30 ft by 40 ft surrounding the exposed valves will be fenced and subsequently graveled. All construction activities will be confined within the approximately 100 ft by 100 ft temporary staging area. All proposed ground disturbance at this location will be conducted in the dry season. Equipment used during construction at this location will include an excavator, backhoe, crane, welding trucks, and generators. Proposed work at this location is anticipated to take four weeks to complete and will include one week of site preparation, two weeks of welding and one week of site restoration.

Access

The main transportation corridors providing access to the project area are I-80, I-680, Highway 12, and county roads. All sites are accessible by existing paved or graveled roads with the exception of MLV 4.88. The lot at MLV 4.88 will be accessed through a gate installed in the existing fence prior to the start of construction. Construction crews will travel approximately 30 feet over bare ground to reach the excavation area. Access to the excavation area will be contained within the proposed temporary construction area (Figure 3).

Temporary Work Areas

Temporary construction staging areas for each of the two sites would be used to stage materials, equipment, and crews during project construction and are identified on Figure 2 and Figure 3.

Schedule

PG&E must coordinate their construction schedule at the two sites with the fuel needs of operating peaker generation plants in the area. Under the terms of PG&E's

contracts with the Independent System Operator (ISO), these plants must typically be available 24/7 from approximately April 1 to September 1. Thus, PG&E is obligated to provide gas during this period. Work at each location requires that the gas line be taken out of service during construction; however, to keep from shutting down the entire line, PG&E will only shut down the section of pipe where construction is planned.

Phase I - Work within in the biologically-sensitive areas at MP 1.38 and MP 4.88 is scheduled for late summer/early fall, between September 1 and October 15, 2009 to take advantage of the dry season. Work would take place from 8 am to 5 pm weekdays and weekends as necessary.

Phase II – Work within the biologically sensitive areas at MP 1.38 and MP 4.88 is scheduled for May, 2010.

9. Surrounding Land Uses and Setting:

Adjacent land uses to the investigation sites consist of agricultural, commercial, industrial, and residential uses. Both the Creed Station Launch Site (MP 1.38) and the Mainline Valve Replacement Site (MP 4.88) are located in unincorporated Solano County. Each of the sites is located on previously disturbed lands, that are either paved or dominated by non-native vegetation. The primary transportation corridors providing access to the Project are I-80, I-680, and Highway 12.

10. Required Agency Approvals:

- It is expected that the project would meet the requirements of a US Army Corps of Engineers (USACE) Nationwide Permit 12 (Utility Line Activities).
- The State Water Resources Control Board (SWRCB) must issue a water quality certification required under Section 401 of the Clean Water Act and is also serving as the lead agency under CEQA.
- Activities affecting federally protected species are regulated by U.S. Fish and Wildlife Service (UWFWS) and National Marine Fisheries Service (NMFS) and would be addressed through Section 7 consultation by USACE during the permitting process. Activities affecting state-protected species are regulated by CDFG and would be addressed through the CEQA process.
- Federal activities affecting historic and cultural resources are regulated under Section 106 of the National Historic Preservation Act and would be addressed by USACE during its permitting process.
- A Stormwater Pollution Prevention Plan will be prepared by PG&E.
- Additional Land Rights from the Solano County are currently being negotiated.

11. Relationship to Local Plans:

Activities planned as part of the project would occur at two locations within Solano County. The investigation sites at MP 1.38 and MP 4.88 are located on unincorporated Solano County lands. These two sites fall under the Solano County General Plan, which was adopted in August 2008. The primary function of the General Plan is to allow the agency to consciously consider and shape its own future by setting forth goals, objectives, and policies regarding future growth and development for a range of subject areas, including land use, circulation, housing, open space, conservation, safety, seismic safety, noise, and scenic highways.

12. References:

The following references were used in completing this Initial Study:

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13. List of Preparers:

This Initial Study for the Gas Line 210A In-Line Investigation Project ct was prepared by CH2M HILL staff, as follows:

Craig Lawrence/CH2M HILL, Project Manager

Greta Kirschenbaum/CH2M HILL, Associate Planner

Dave Lundgren/CH2M HILL, Associate Planner

Lynne Hosley/CH2M HILL, Principal

Dana Morawitz/CH2M HILL, Associate GIS Developer

Frankie Burton/CH2M HILL, Planner

Insert Figure 1, Project Location Map

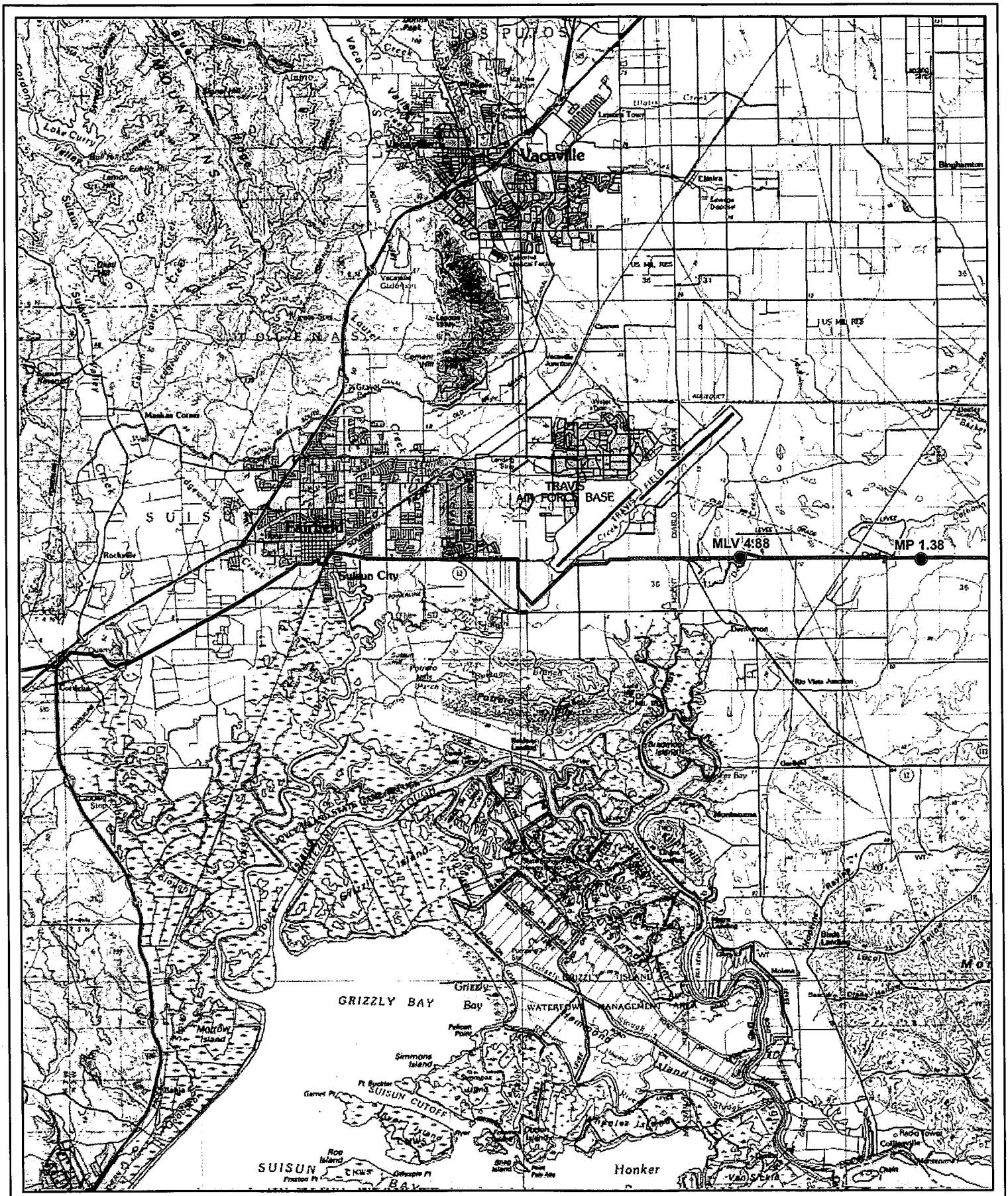

Figure 1: Vicinity Map
PG&E Gas Line 210A&B
ILI Repair Project
Solano County, California
March 2009

Figure 2: MP 1.38
PG&E Gas Line 210A&B
ILI Repair Project
Solano County, California
March 2009

Project Site

N

0 100 200 Feet

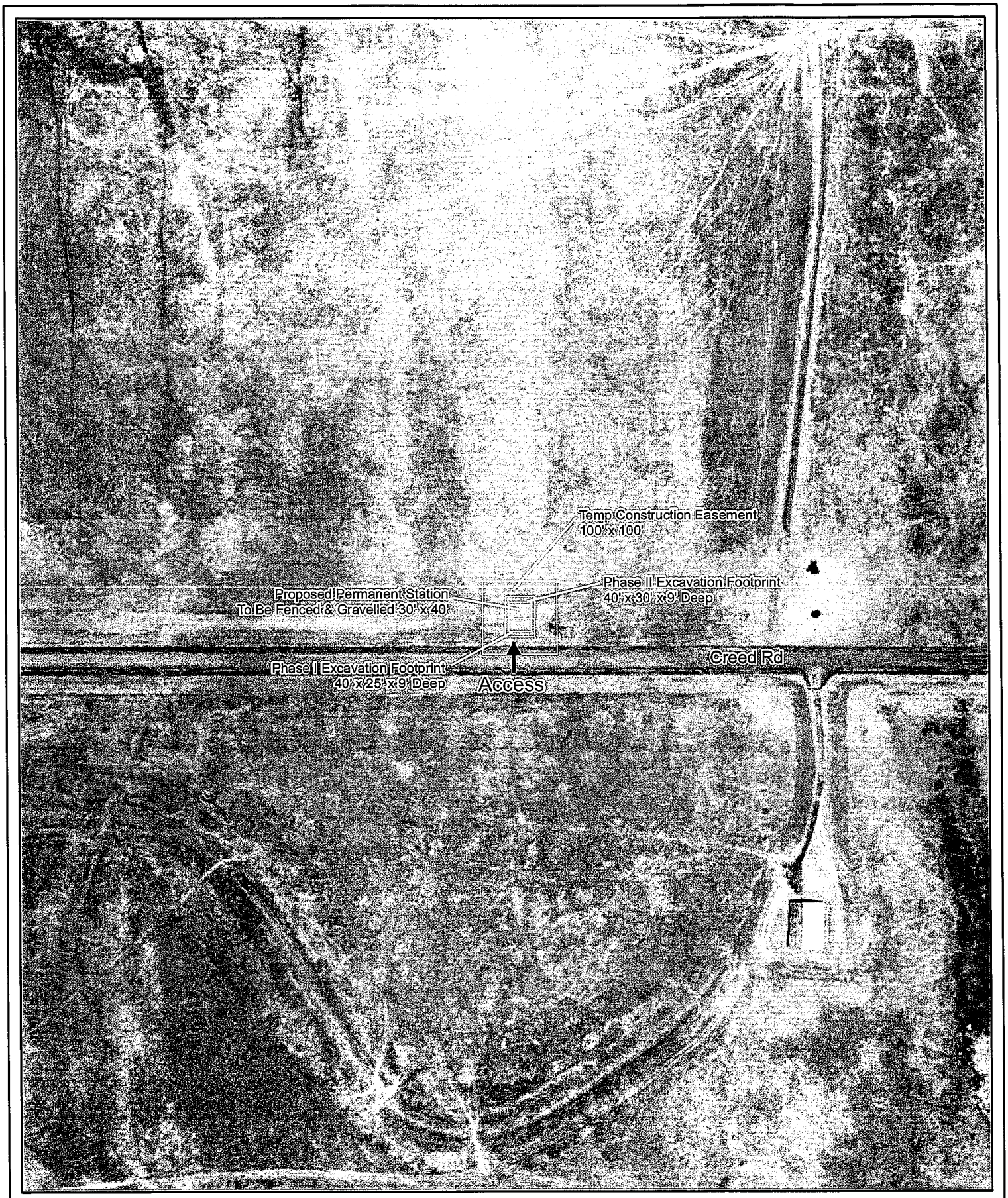

Figure 3: MLV 4.88
PG&E Gas Line 210A&B
ILI Repair Project
Solano County, California
March 2009

Project Site

N

0 100 200 Feet

1. **AESTHETICS.** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☑
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☑
(c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑	☐
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☑

The project site consists of 3.5 miles of Gas Line 210A and 210B in Solano County, along which maintenance would be conducted at two investigation locations. The existing visual character along the project corridor varies with each investigation site location. An unpaved service road parallels the creek. The Mainline Valve Replacement site (MP 4.88) is located along Creed Road. This site is located on grazing land dominated by non-native annual grasses, and is maintained by discing.. Construction of the valve lot has eliminated any depressions in the immediate area, which slopes gradually to the west. However, about a hundred feet north of the fence a more natural topography, with depressions capable of holding water, is evident. The Creed Station Launch site (MP 1.38) is located on the south side of Creed Road. The station is fenced and graveled. PG&E is proposing to acquire the adjacent 50 ft by 190 ft parcel west of the station. The parcel is covered in non-native grassland and bordered by drainage on the west.

Construction activities would have a temporary and minor impact on the visual character of the investigation sites; however, following the proposed project related activities, construction areas would be restored to their pre-project appearance. The project would not affect any scenic vistas; nor would any historic or scenic resources be damaged by the project. No new permanent sources of light or glare would be added by the proposed project.

2. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☑
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☑	☐
(c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☑

The Project would not result in the conversion of existing farmland, including Prime or Unique Farmland, or Farmland of Statewide Importance, to non-agricultural use. The two proposed investigation sites are designated by the Solano County General Plan as Agriculture. However, neither of these sites is designated as having prime agricultural soils, as defined by the United States Department of Agriculture. In addition, public utilities are not subject to local planning and zoning codes.

The Creed Station Launch site (MP 1.38) is currently fenced and graveled, and the site located immediately to the west, which PG&E proposes to acquire, is dominated by non-native grassland. Neither is used for the cultivation of cultivated agriculture. The Mainline Valve Replacement site (MP 4.88) is dominated by non-native grassland and is currently used for grazing. Grazing in work and staging areas around the site would be temporarily halted during construction; however, sufficient adjacent areas are available to continue grazing operations. Project work areas would be fenced to protect grazing livestock.

The Project would not conflict with existing agricultural use or with a Williamson Act contract.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☑

Federal

Federal air quality policies are regulated through the federal Clean Air Act. Pursuant to this act, the U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for the following air pollutants (called "criteria" pollutants): carbon monoxide, ozone, nitrogen dioxide, sulfur dioxide, PM10, fine particulate matter (defined as particulate matter less than 2.5 microns in aerodynamic diameter [PM2.5]), and lead. The ambient air quality standards represent levels established to avoid specific adverse health and welfare effects associated with each pollutant. Table 1 summarizes the ambient air quality standards.

The EPA has designated counties in California as either attainment or nonattainment for each NAAQS. A region that is meeting the air quality standard for a given pollutant is designated as being in "attainment" for that pollutant. If the region is not meeting the air quality standard, then it is designated as being in "nonattainment" for that pollutant. If a state is designated as nonattainment for a NAAQS, the CAA requires the state to develop a State Implementation Plan (SIP) to demonstrate how the standard will be attained. Solano County has been designated as being in nonattainment for PM10, PM2.5, and ozone because the County is nonattainment for these pollutants.

TABLE 1
Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS	NAAQS[b]	
			Primary [c]	Secondary [d]
Ozone	8 hours 1 hour	0.070 ppm 0.09 ppm	0.075 ppm —	0.08 ppm —
Respirable Particulate Matter (PM_{10})	Annual Arithmetic Mean 24 hours	20 $\mu g/m^3$ 50 $\mu g/m^3$	— 150 $\mu g/m^3$	— 150 $\mu g/m^3$
Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean 24 hours	12 $\mu g/m^3$ 35 $\mu g/m^3$	15 $\mu g/m^3$ 35 $\mu g/m^3$	15 $\mu g/m^3$ 35 $\mu g/m^3$
Carbon Monoxide	8 hours 1 hour	9.0 ppm 20 ppm	9 ppm 35 ppm	— —
Nitrogen Dioxide	Annual Arithmetic Mean 1 hour	0.030 ppm 0.18 ppm	0.053 ppm —	0.053 ppm —

TABLE 1
Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS	NAAQS[b]	
			Primary [c]	Secondary [d]
Sulfur Dioxide	Annual Arithmetic Mean 24 hours 3 hours 1 hour	— 0.04 ppm — 0.25 ppm	0.03 ppm 0.14 ppm — —	— — 0.5 ppm —
Lead[e]	Calendar Quarter Rolling 3-month Average 30-day Average	— — 1.5 µg/m^3	1.5 µg/m^3 0.15 µg/m^3 —	1.5 µg/m^3 0.15 µg/m^3 —
Visibility-reducing Particles	8 hours	[f]	—	—
Sulfates	24 hours	25 µg/m^3	—	—
Hydrogen Sulfide	1 hour	0.03 ppm	—	—
Vinyl Chloride[e]	24 hours	0.01 ppm	—	—

Notes:

µg/m^3 = micrograms per cubic meter

ppm = parts per million (by volume)

[a] California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and suspended particulate matter (PM_{10}, $PM_{2.5}$, and visibility-reducing particles) are values that are not to be exceeded. All others are not to be equaled or exceeded.

[b] National standards other than ozone, particulate matter, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, is equal to or less than the standard.

[c] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[d] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[e] The ARB has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. ARB made this determination following the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[f] Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70 percent.

Source: ARB, 2009

State

The California Air Resources Board (ARB) oversees California air quality policies. The California Clean Air Act was approved in 1988, and as amended in 1992, established the California Ambient Air Quality Standards (CAAQS). These standards are generally more stringent and include more pollutants than the NAAQS. Similar to the EPA, ARB designates counties in California as attainment or non-attainment for the CAAQS.

The ARB has the primary responsibility and produces a major part of the SIP for nonattainment pollutants. However, the ARB also relies on the local air districts to provide additional strategies for sources under their jurisdiction. The ARB combines its data with local district data and submits the completed SIP to the EPA. The SIP consists of the emissions standards for vehicular sources and consumer products set by the ARB, and attainment plans adopted by the air districts and approved by the ARB.

Local Air Districts

The Project is located in Solano County in the San Francisco Bay Area Air Basin. Solano County is split between two air districts, the Bay Area Air Quality Management District (BAAQMD) and the Yolo-Solano Air Quality Management District (YSAQMD). The BAAQMD has jurisdiction over the southwestern portion of Solano County and the YSAQMD has jurisdiction over the northeastern portion of Solano County. Both air districts are described in the following section.

Bay Area Air Quality Management District

The BAAQMD is the local agency charged with preparing, adopting, and implementing mobile, stationary, and area air emission control measures and standards for sources in the San Francisco Bay Area Air Basin. The BAAQMD works in cooperation with the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) to develop air quality plans. The BAAQMD prepares ozone attainment demonstrations for the federal ozone standard and clean air plans for the California ozone standard. The 2001 Ozone Attainment Plan is the BAAQMD contribution to the SIP for demonstrating attainment of federal ozone standard. The 2005 Bay Area Ozone Strategy is the currently approved ozone clean air plan. The 2005 Strategy shows how the Bay Area will make progress towards meeting the State 1-hour ozone standard and reduce transport of ozone and ozone precursors to neighboring air basins. Currently, the BAAQMD is preparing the 2009 Clean Air Plan. This plan will update the 2005 Ozone Strategy and will be a comprehensive plan addressing ozone precursors, particulate matter, toxic air contaminants, and greenhouse gases. This plan is scheduled for adoption in Fall 2009.

Since the BAAQMD currently attains the 24-hour PM10 standard, the BAAQMD is not required to develop a plan for this standard at this time. However, the BAAQMD was recently designated nonattainment of the new 24-hour standard for PM2.5. The BAAQMD is required to submit an attainment plan to EPA by April 2012 that demonstrates attainment of the new 24-hour PM2.5 standard by April 2014.

Yolo-Solano Air Quality Management District

The YSAQMD is the local agency charged with preparing, adopting, and implementing mobile, stationary, and area air emission control measures and standards for sources in Yolo County and the northeastern portion of Solano County. The 1994 Sacramento Area Regional Ozone Attainment Plan is the current federal ozone plan (SIP) for the YSAQMD, and sets out stationary source control

programs and statewide mobile source control programs for attainment of the 1-hour ozone standard. In February 2009, the Board of Directors of the air districts in the Sacramento Federal Nonattainment Area, which includes the YSAQMD, adopted the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The Plan will reduce emissions at the required rate of 3% per year so the region can attain the 8-Hour Ozone standard by 2018. Although the YSAQMD is in nonattainment for the state PM10 standard, a PM10 attainment plan is not required (YSAQMD, 2009).

During construction, portable equipment greater than 50 horsepower, other than vehicles, must be registered with either the ARB Portable Equipment Registration Program (PERP) or with air district. This requirement applies to equipment used in both the BAAQMD and the YSAQMD.

Construction of the Project would result in short-term, construction related emissions; however, these emissions would be consistent with thresholds set forth in the BAAQMD and YSAQMD air quality plans. Both the BAAQMD and YSAQMD air quality plans include construction equipment emissions (NOX and ROG) in the emissions inventory that is the basis for developing the plans. Operation of the Project would result in minor air emissions from maintenance activities. However, these activities are already part of the maintenance and operation of the existing lines and towers. Therefore, operation emissions would not be expected to increase from existing conditions and the Project would not conflict with or obstruct implementation of the BAAQMD or YSAQMD air quality plans.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☑	☐

Construction Impacts

Short-term impacts from the Project may result from construction activities. In nonattainment areas, construction equipment exhaust emissions of ozone precursors (NOx and ROG), exhaust PM10, and soil-disturbing activities may temporarily impact air quality. According to the BAAQMD CEQA Guidelines, implementation of the measures identified in the CEQA Guidelines would minimize fugitive PM10 emissions during construction. Similarly, YSAQMD recommends implementing best management practices to minimize fugitive dust emissions (YSAQMD, 2007). With implementation of these measures, impacts associated with temporary fugitive dust emissions would be less than significant.

These fugitive dust measures would not address exhaust emissions of NOX or ROG. According to the BAAQMD CEQA Guidelines, construction equipment emissions (NOX and ROG) are included in the emissions inventory that is the basis for the regional air quality plans and are not expected to impede attainment or maintenance of the ozone standards in the Bay Area (BAAQMD, 1999).

Operational Impacts

Operation of the Project would result in minor air emissions from periodic operation and maintenance activities. However, these activities are already part of the maintenance and operation of the existing lines and towers. Therefore, operation emissions would not be expected to increase from existing conditions and the Project would not be expected to cause or contribute to an air quality violation.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☑	☐

Solano County is designated nonattainment for the state and federal ozone standards, the state PM10 standard, and the federal PM2.5 standard. Construction of the Project would result in emissions of ozone precursors (NOx and ROG), PM10, and PM2.5. However, these emissions would be temporary and would not be expected to result in a cumulatively considerable net increase in ozone, PM10, or PM2.5 concentrations. Therefore, the cumulative impact to air quality would be less than significant. Operation of the Project would not result in an increase in air emissions. Therefore, the cumulative air quality impact would be less than significant.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐

Sensitive receptors are facilities such as hospitals, schools, convalescent facilities, or residential areas (YSAQMD, 2007).

The closest sensitive receptor to investigation site MP 1.38 is a residential area 5.6 miles away. The closest sensitive receptor to investigation site MP 4.88 is a residential area 2.3 miles away.

The Project is not expected to result in substantial pollutant concentrations as shown in the discussion of construction emissions above. Operation of the proposed Project would not result in an increase in air emissions. Therefore, the air quality impact to sensitive receptors would be less than significant.

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☑

Exhaust emissions from construction equipment may result in temporary odors but would not affect a substantial number of people, because of the temporary nature of the Project. The
Project would not create or cause the need to create the types of facilities that could potentially generate odors during operation, such as wastewater treatment plants, food processing plants, or landfills (YSAQMD, 2007). Operation of the Project has no potential for generating odors. Construction of the proposed Project would not result in an odor-related impact.

Avoidance and Minimization Measures

As previously stated, the BAAQMD and YSAQMD recommend implementing fugitive dust control measures for construction projects. The following control measures are based on the BAAQMD CEQA Guidelines for reducing PM10 emissions during construction. The BAAQMD control measures include the most of the measures recommended by the YSAQMD as best management practices. Therefore, the Project will utilize the BAAQMD control measures for the entire alignment of the Project.

Basic control measures: The following control measures should be implemented at all investigation sites.

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of free board.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Enhanced control measures: The following control measures should be implemented at all investigation sites greater than four acres in area.

- All "Basic" control measures listed above.
- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit traffic speeds on unpaved roads to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Replant vegetation in disturbed areas as quickly as possible.

Optional control measures: The following control measures are strongly encouraged at investigation sites that are large in area, located near sensitive receptors or which for any other reason may warrant additional emissions reductions.

- Install wheel washers for all existing trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Install wind breaks, or plant trees/vegetative wind breaks at windward side(s) of construction areas.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
- Limit the area subject to excavation, grading and other construction activity at any one time.

4. BIOLOGICAL RESOURCES. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☑	☐	☐

Setting

The proposed project is located in southern Solano County, California. Solano County is located at the intersection of San Francisco Bay and the Sacramento and San Joaquin river delta. The County encompasses a variety of habitat types,