Addendum to Mitigated Negative Declaration

Date of Publication of the Addendum: March 17, 2017
Date of Final MND: May 2, 2016
Case No.: 2013.1761E
Project Title: PG&E Gas Transmission Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Project San Mateo County
Zoning: Resource Management
Block/Lot: Various
Project Sponsor: Pacific Gas and Electric Company (PG&E) Kristina Caliando
Lead Agency: San Francisco Planning Department
Staff Contact: Paul Maltzer – (415) 575-9038 paul.maltzer@sfgov.org

Background

On May 2, 2016, the San Francisco Planning Department issued the Pacific Gas and Electric Company (PG&E) Gas Transmission Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Final Mitigated Negative Declaration (MND). In June 2016, the project sponsor received Revocable License #4247 (License) from the San Francisco Public Utilities District (SFPUC) for the replacement of Gas Transmission Pipeline 109 (L109), for the project analyzed in the MND.

As analyzed in the MND, the project involves issuance of temporary and permanent easements from the City and County of San Francisco to construct the Gas Transmission Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Project. The project involves replacing a combined total of approximately 4.7 miles of existing underground natural gas pipeline across SFPUC Peninsula Watershed lands within unincorporated San Mateo County. Specifically, the existing pipeline would be replaced with 24- and 30-inch-diameter pipe to facilitate future pipeline integrity testing using an automated in-line inspection tool. The pipeline replacement would occur in the following three segments: Cañada Road segment, Bunker Hill segment, and Crystal Springs segment.

Pipeline replacement would occur adjacent and parallel to the existing pipeline, with four exceptions: 1) approximately 0.37 mile of pipeline along the Cañada Road segment, which would be replaced in a new alignment to avoid impacting biological resources; 2) approximately 2,300 feet of trenchless (drilled) pipeline along the Bunker Hill segment, which would deviate approximately 42 feet from the existing...
pipeline to avoid a rare plant population; 3) an approximately 200-foot-long section of pipeline at the northern end of the Bunker Hill segment, which would avoid several constraints associated with existing electric transmission towers, an electric substation, and I-280; and 4) the Crystal Springs segment, which would be replaced in place. The new pipeline would be installed via a combination of cut-and-cover open trench construction and horizontal directional drilling. The MND stated that the construction period was expected to last approximately 15 months for all three segments, approximately 5 to 7 months per segment.

The project sites and surroundings consist of undeveloped rolling hills covered in oak woodland, grassland, chaparral, and mixed evergreen forest. The project area is zoned RM (Recreation Management) and is designated as Parks/Open Space in the San Mateo County General Plan. The project route is entirely within SFPUC Watershed lands—used for water collection, storage, and quality protection—that are off limits to the public, except along hiking trails that were jointly established by the SFPUC, U.S. Department of the Interior, California Department of Transportation, and San Mateo County.

Proposed Modifications to the Project

The project sponsor has revised the project evaluated in the MND. The modified project differs from that analyzed in the MND as follows:

- The 1.2-mile-long Crystal Springs segment replacement would be changed to a parallel offset alignment, rather than being replaced in-place. The new offset alignment would be 5 to 7 feet from the existing pipeline. The existing L109 pipeline would be abandoned in place and filled with concrete slurry after construction of the replacement pipeline.

- New permanent pipeline easement is requested by PG&E for the new alignment.

Figure 3: Project Overview Map Crystal Springs Segment, in Appendix A in the Final MND represents the original Crystal Springs segment alignment; revised Figure 3 in this Addendum shows the proposed, modified Crystal Springs segment alignment.

With this change, the same approximately 1.2-mile-long segment of L109 would be replaced with 24- and 30-inch pipeline, except that a new trench would be excavated parallel to the existing alignment for installation of the new pipeline. The offset alignment would follow the same route and tie-in to the existing L109 at the same locations as the replace-in-place alignment would have.
Addendum to Mitigated Negative Declaration
March 17, 2017

The same temporary work space, construction staging, ground disturbance, and access points covered in the MND and the License are sufficient for construction of the proposed offset alignment. PG&E proposes the acquisition of new permanent pipeline easement, approximately 3.7 acres, for the 4C offset alignment (modified project), shifted approximately 5 to 7 feet from the alignment previously approved, as shown in revised Figure 3. The original project analyzed in the MND did not include the acquisition of new permanent pipeline easement for the Crystal Springs segment.
Addendum to Mitigated Negative Declaration
March 17, 2017
PG&E Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Project

This page intentionally left blank
Figure 3
Project Overview Map
Crystal Springs Segment
Analysis of Potential Environmental Effects

Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of the California Environmental Quality Act, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.” This Addendum to the MND for the PG&E Gas Transmission Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Project documents the environmental effects of the change to the Crystal Springs segment replacement and concludes that the modified project would not result in any new significant impacts not identified in the MND, and that no new mitigation measures would be necessary.

The MND found that the project would result in either no impacts, less-than-significant impacts, or impacts that would be less than significant with mitigation. The modified project proposes to change the alignment of the Crystal Springs segment to approximately 5 to 7 feet from the existing pipeline. Given the minor change in alignment of the Crystal Springs segment, the modified project would have similar effects as the original project.

As described further in the following paragraphs, the modified project would not result in new or different environmental impacts, substantially increase the severity of the previously identified environmental impacts, or require new mitigation measures, and no new information has emerged that would materially change the analyses or conclusions set forth in the MND. Therefore, the modified project would not change the analysis or conclusions in the MND. The following discussion provides the basis for this conclusion.

Cultural Resources

The MND found that the project would have no impact on historic resources, and less-than-significant impacts with mitigation incorporated on archeological resources, human remains, and tribal cultural resources. While the modified project would include a slightly different location of excavation than the project in the MND, the broader California Environmental Quality Act Area of Potential Effect (C-APE) examined for potential impacts in the MND would remain the same as potential cultural resource impacts from the modified project would still be confined to that C-APE since the construction staging and work areas would not change. The MND found that no known archeological resources are located within the C-APE. The potential effects on archaeological resources, human remains, and tribal resources
Addendum to Mitigated Negative Declaration
Case No. 2013.1761E
PG&E Line 109 Cañada Road, Bunker Hill, and Crystal Springs Pipeline Replacement Project
March 17, 2017

would be the same as the original project, and would be reduced to a less-than-significant level with implementation of Mitigation Measure M-CR-2: Archaeological Monitoring, Mitigation Measure M-CR-3: Unanticipated Discoveries for Human Remains, and Mitigation Measure CR-4: Tribal Cultural Resources Interpretative Program.

**Air Quality**

The MND found that the project’s construction air quality impacts from fugitive dust and criteria air pollutants would be less than significant with implementation of Mitigation Measures M-AQ-1a: Dust Control and M-AQ-1b: Construction Emissions Minimization Plan. Construction of the proposed offset replacement of the 1.2-mile-long Crystal Springs segment alignment is anticipated to reduce the schedule by 4 to 5 months compared to the replace-in-place option because the existing pipeline would not be removed and hauled off site for disposal. As a result, total NOx emissions would be less for the proposed offset alignment compared to the replace-in-place alignment, because the replacement would require fewer truck trips. A health risk screening assessment (HRSA) was conducted as a part of the MND to evaluate potential health risk to nearby sensitive receptors. Health risk impacts are evaluated based on the exposure of sensitive receptors to air pollutants that are approximately 1,000 feet from an emission source. The nearest sensitive receptor to the Crystal Springs segment for both linear and area source emissions is located approximately 100 feet northeast of station 55+00. Because the workspace and construction staging areas for the modified project would not change from those analyzed in the MND for the original proposal, the locations of potential air pollutant emissions from construction of the modified project would not change from what as analyzed in the MND. With implementation of Level III Verified Diesel Emission Control Strategies as mitigation input into the HRSA tool, in compliance with Mitigation Measure M-AQ-1b, the Crystal Springs segment would not expose sensitive receptors to either cancer, chronic, acute, or PM_{2.5} risk in excess of the significance thresholds. Because the new offset Crystal Springs segment alignment is located only 5 to 7 feet from the original Crystal Springs segment alignment and construction staging and work areas would not change from what was analyzed in the previously approved project, the proposed offset alignment would not expose sensitive receptors to health risks resulting from pollutants, and impacts would remain the same as the original project and would be reduced to a less-than-significant level with implementation of Mitigation Measure M-AQ-1b.

**Biological Resources**

The MND found that the project would not conflict with an adopted habitat conservation plan, would have a less-than-significant impact on wildlife movement, and would have less-than-significant impacts
with mitigation incorporated on sensitive species, sensitive natural communities, wetlands, and two local policies protecting oak woodlands and tree preservation.

The offset alignment change of the Crystal Springs segment under the modified project would result in similar impacts on the 14 special-status species listed in the MND, as the work areas for the modified project would remain the same and the new offset Crystal Springs segment alignment is located only 5 to 7 feet from the original Crystal Springs segment alignment. Potential significant impacts on these species would be reduced to a less-than-significant level with implementation of the species-specific Mitigation Measures M-BI-1a-e and M-BI-g, M-BI-1f: Habitat Protection Measures, M-BI-3: Protection Measures for Jurisdictional Water Bodies and Riparian Areas, and M-BI-5: Pre-construction Tree Surveys and Tree Removal.

The new offset Crystal Springs segment alignment would trench through three swales—located at stations 2+00, 39+75, and 54+50—which is the same as was proposed for the original project (see Section A.3.3 of the MND). Jack-and-bore techniques may be used within the Crystal Springs segment, east of the Caltrans Crystal Springs Safety Roadside Rest Area near station 11+00, to avoid trenching through the access road. To avoid trenching through Hayne Road and Black Mountain Road north of Hayne Road, the pipeline would be installed under the road using jack-and-bore techniques. The modified project would not change any of these aspects of the original proposal. These temporary impacts would be mitigated to a less-than-significant level through implementation of Mitigation Measure M-BI-1f and the project-specific Stormwater Pollution Prevention Plan.

No additional oak woodland or trees along the new offset Crystal Springs segment alignment are proposed for removal. As under the MND, Mitigation Measure M-BI-5, which requires that any native trees removed be replaced at a minimum mitigation ratio of 1:1, would reduce the impact on tree preservation in San Mateo County to a less-than-significant level for the modified project.

The work areas identified in the MND along the Crystal Springs segment were sited to avoid impacting populations of Marin western flax (*Hesperolinon congestum*). The work area evaluated in the MND would be the same for the modified Crystal Springs offset alignment, and Marin western flax would be avoided. Any new/larger populations of Marin western flax identified after the work areas were sited would be avoided by adjusting the construction boundary fencing to exclude Marin western flax from the work
area and installing the pipe with a trenchless bore from approximately stations 14+50 to 15+50, to avoid a population of Marin western flax. This would remain unchanged by the modified project.

SFPUC has fountain thistle mitigation sites within the Crystal Springs segment work area. PG&E would install trench breakers during trench construction of the offset alignment, as was also proposed for the replace-in-place alignment. As a result, impacts on the fountain thistle mitigation sites would be avoided for offset construction.

**Geology and Soils**

The MND found that the project would have less-than-significant impacts related to exposure of people and structures to strong seismic ground shaking, liquefaction and landslides, soil erosion, and changes to topography and geologic units, and less-than-significant impacts with mitigation related to unstable geologic units, expansive soils, and paleontological resources. As the new offset Crystal Springs segment alignment would be located within 5 to 7 feet of the original alignment, the geologic and soils environmental setting would remain the same, and impacts under the modified project would remain less than significant with the incorporation of Mitigation Measures M-GE-3: Site Preparation and M-GE-6: Unanticipated Discoveries for Paleontological Resources.

**Hydrology and Water Quality**

The MND found that the project would have less-than-significant impacts related to groundwater depletion and stormwater drainage, and all other potential impacts on hydrology and water quality would be less than significant with mitigation incorporated. From a topographical or hydrological perspective, there is nothing unique or substantially different between the off-set alignment setting and the original alignment setting analyzed in the MND. As with the original project, the modified project would not result in substantial permanent alteration of topography, and would avoid impacting drainage patterns and runoff. The modified project would not introduce any impacts related to water quality, erosion, flooding, sieche, tsunami, or mudflow that were not already captured in the MND and mitigated by Mitigation Measures M-HY-1a: Trench Plugs, M-HY-1b: HDD Fluid Release Contingency Plan, and M-BI-1f: Habitat Protection Measures.

**Hazards/Hazardous Materials**

The MND found that the project would have no impact on implementation of emergency response plans, less-than-significant impact related to transport of hazardous materials, and less-than-significant impacts
with mitigation related to release of hazardous materials and exposure to fires. Construction of the modified project would involve the same potential for small accidental releases of hazardous materials (i.e. fuel, oil, and lubricant) as the original project, and these impacts would be mitigated to a less-than-significant level through implementation of Mitigation Measure M-HZ-2: Treatment of Unanticipated Hazardous Materials and M-HZ-3: Notify and Consult with Affected Schools. As with the original project, the modified project is located within a State Response Area ranging in designation from moderate to very high fire hazard severity. PG&E would clear trees and shrubs within 10 feet on either side of the new offset Crystal Springs segment alignment (which would still be confined to the originally analyzed work areas), as described under Mitigation Measure M-HZ-6: Fire Avoidance and Suppression, and would follow the rest of the guidance in the measure to reduce impacts related to fire exposure to a less-than-significant level.

Other Environmental Topics

When compared to the original project, the modified project would represent no change from the less-than-significant impacts related to land use, population and housing, transportation and circulation, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, mineral/energy resources, and agricultural and forest resources. The MND noted less-than-significant impacts with mitigation incorporated on land use, aesthetics, and noise; however, the modified project does not involve changes to the portion of the original project that resulted in those impact determinations. The land use, noise, and aesthetics impacts associated with the Crystal Springs segment evaluated in the MND would remain the same under the proposed offset alignment of the Crystal Springs segment. The modified project would neither increase the severity of the impacts associated with the project or result in new or substantially different environmental effects. Thus, these topics do not warrant further discussion.

The MND’s mitigation measures would be implemented prior to or during construction, as applicable, to mitigate potential significant impacts. The significance conclusions reached in the MND would not change based on the project modifications, and all applicable mitigation measures from the MND would be applied to the modified project.

Conclusion

Based on the foregoing information, it is concluded that the analyses conducted and the conclusions reached in the Final MND issued on May 2, 2016, remain valid. The proposed revisions to the project
would not cause new significant impacts not identified in the MND, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

I do hereby certify that the above determination has been made pursuant to State and Local Requirements.

March 17, 2017
Date of Determination

LISA M. GIBSON
Acting Environmental Review Officer

cc: Kristina Caliando, Project Sponsor
   Distribution List
   Virna Byrd, Master Decision File/Bulletin Board