

JUSTIFICATION & FINDINGS FOR NOTICE OF EXEMPTION Replacement of Various Water Lines and Manifold and Addition of Backup Generators at Existing Well Sites

The City of Needles proposes to replace: 1) various water service laterals within 26 paved roads throughout the water system as part of the on-going pavement management program; 2) a 6” water main in River from near SoCal Gas Plant to Jack Smith Park; 3) a manifold pipe at Rivers Edge Golf Course Maintenance Yard; and 4) to add backup diesel generators at existing sites for Wells No. 15 and 16. Waterline and manifold replacements will be at locations of existing infrastructure with no change in use or capacity; backup generators will be for the purpose of providing continuous energy supply during power outages at Wells No. 15 and 16 . None of the proposed construction would impact any new undisturbed areas. Equipment/material staging areas would be within the paved road rights-of-way and/or the disturbed area of the golf course, and at the water well sites. Replacements of the deteriorating portions of the City’s water system as well as the backup generators are required for the system to be brought up to code and to meet State and County requirements for the domestic water system. Figure 1 shows the locations of the proposed infrastructure replacement project.

For purposes of the California Environmental Quality Act (“CEQA”), the Project qualifies for a Categorical Exemption under CEQA Section 15302 Replacement or Reconstruction; 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. Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity are included. Findings of no impacts to environmental resources follows.

NEEDLES, CALIFORNIA LOCATION OF PROJECT WORK

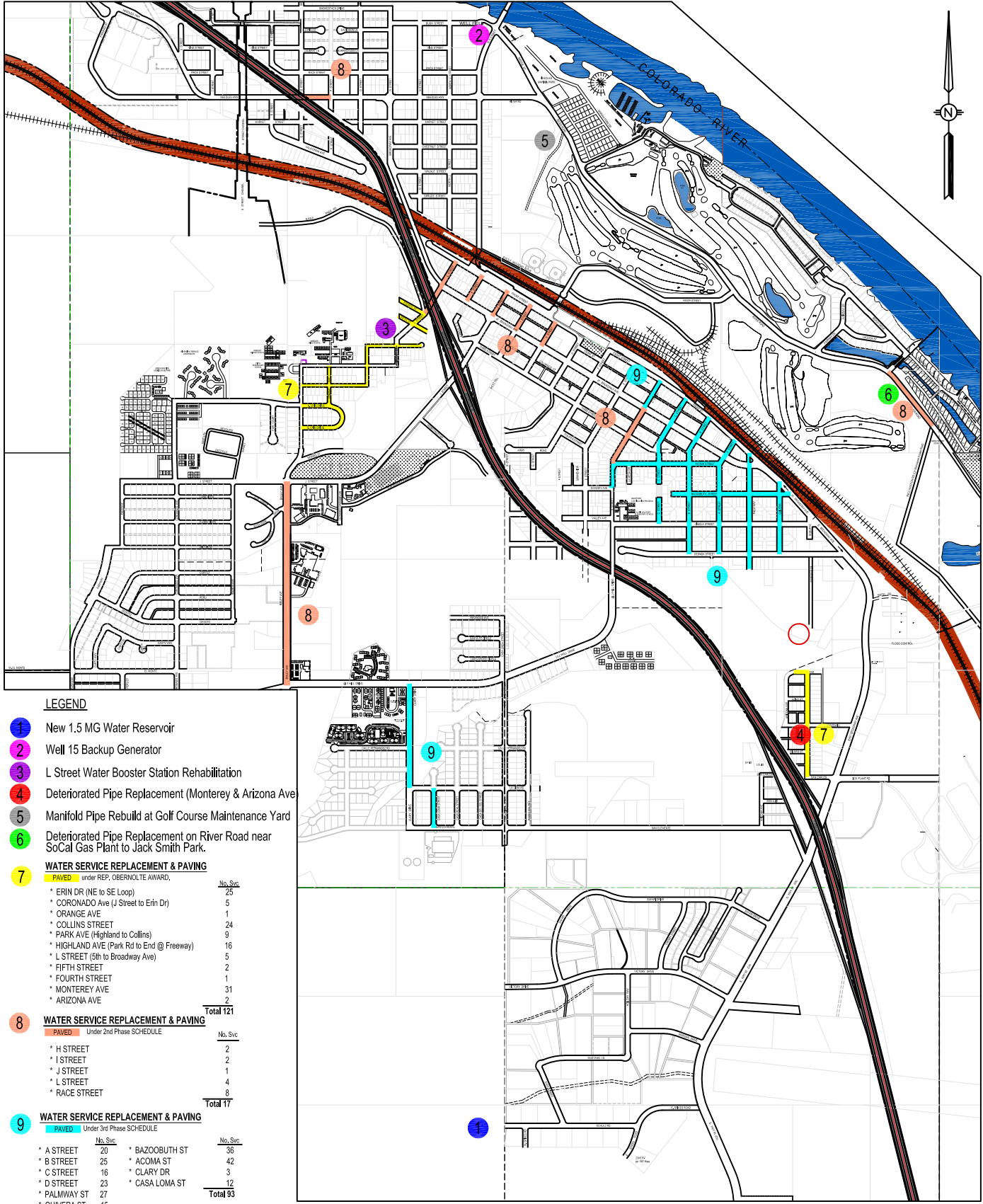


FIGURE 1

CEQA Findings

Air Quality

The emissions calculations for the construction phase of the water line and manifold replacement activities were modeled and results are shown in tables 1 and 2.

Table 1
Summer Construction Emissions
(Pounds Per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Other Construction Eq.	1.6	8.9	11.2	0.0	0.3	0.3
Excavator	0.5	2.5	4.1	0.0	0.1	0.1
Generator	0.3	2.2	2.2	0.0	0.1	0.1
Haul Truck	0.7	4.1	3.5	0.0	0.2	0.2
Total (lbs/day)	3.1	17.8	20.9	0.0	0.7	0.7
MDAQMD Threshold	137	137	548	137	82	82
Significant	No	No	No	No	No	No

Source: SCAQMD SCAB Fleet Average Emissions Factors (2022)

As shown in Table 1 construction emissions would not exceed Mojave Desert AQMD (MDAQMD) thresholds. Therefore, impacts would be less than significant.

The Proposed Project would not generate Fluorinated gases as defined by AB 32, only the GHGs (CO₂, CH₄, and N₂O) that are emitted by construction equipment would occur. Therefore, GHG emissions from CO₂, CH₄, and N₂O were modeled and are shown below in Table 2.

Table 2
Greenhouse Gas Construction Emissions
(Metric Tons Per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O
Other Construction Equipment	177.1	0.0	0.0
Excavator	43.2	0.0	0.0
Generator	21.9	0.0	0.0
Haul Truck	50.8	0.0	0.0
Total Max (MTCO _{2e})	293.50		
Amortized over 30 years	9.8		
MDAQMD Threshold (MT)	90,718		
Significant	No		

Source: SCAQMD SCAB Fleet Average Emissions Factors (Diesel, 2022); N₂O emissions CAPCOA Guidelines August 2010.

Model results for GHG emissions related to construction of the water line and manifold replacements as shown in Table 2 do not exceed the MDAQMD thresholds and therefore would not result in a significant impact. No mitigation measures are required.

There would be no operational emissions associated with the water lines and manifold being replaced. The emergency use of the backup generators would only occur during power outages. Each generator would be permitted to operate by the MDAQMD.

Biological Resources

The water line and manifold replacement and addition of generators at two well sites will provide new facilities at the same locations of existing facilities Figure 1. All replacement work will be done within paved roads and/or at the Rivers Edge Golf Course location of the existing manifold at the Maintenance Yard. Equipment/material staging areas would be within the paved road rights-of-way and/or the disturbed area of the golf course. No vegetation surrounding the Maintenance Yard would be disturbed. No habitat exists within the paved roads. Therefore, no impacts to biological resources would occur.

Cultural Resources

The project will provide new facilities at the same location as exiting facilities. All work will be done within paved roads and/or at the Rivers Edge Golf Course, the existing manifold at the Maintenance Yard and two existing well sites. Excavation activities will not exceed the current depth of the pipelines and therefore no materials would be encountered that were not previously disturbed. Equipment/material staging areas would be within the paved road rights-of-way and/or the disturbed area of the golf course. Therefore, no impacts to cultural resources would occur.

Water Quality

The water line replacement project will provide new facilities at the same location as the exiting facilities as described. There will be no change over existing conditions in the source or quantity of water pumped for the distribution system. There are no drainages in the vicinity of the pipelines and there would be no discharge to surface waters or groundwater associated with construction or continued operation of the water system. Therefore, no impacts to surface or groundwater quality would occur.