

Project title: COTP River Crossing Tower Painting Project

Requested By: Patrick Day

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Code : N5714**

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Date Submitted: 12-16-14

Date Required: 12-19-14

Description of the Project:

Purpose and Need

The Western Area Power Administration (Western), Sierra Nevada Region (SNR), is responsible for the operation and maintenance (O&M) of federally owned and operated transmission lines, switchyards, and facilities throughout California. Western must comply with the National Electric Safety Code, Western States Coordinating Council (WECC), and internal directives for protecting human safety, the physical environment, and maintaining the reliable operation of the transmission system. River crossing towers on the COTP line between the Olinda and Tracy substations require paint application in order prevent corrosion.

Tower maintenance, including paint application is consistent with Western's transmission line operation and maintenance activities and qualifies for a Categorical Exclusion in accordance with National Environmental Policy Act (NEPA) Section 102(2), Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (40 CFR parts 1500-15085) and Department of Energy (DOE) Part 1021 – NEPA Implementing Procedures: Categorical Exclusions B4.6 which allows for additions or modifications to electric power transmission facilities.

Project Description

The COTP River Crossing Tower Painting project involves painting towers associated with two river crossings. The structures are located in northern California at California – Oregon Transmission Project (COTP) crossings of the Sacramento and San Joaquin Rivers approximately seven (7) miles northeast of Antioch, CA. The project scope includes painting of previously unpainted portions of the river crossing towers (51B and 51B1 tower types) and the entirety of the anchor towers (51W tower types). Previously coated portions of 51B and 51B1 towers are coated with lead-based paints; abatement of lead-based paint is not part of the project scope.

STRUCTURE LIST

STR	TYPE	ELEVATIONS FOR PAINTING	DESCRIPTION
167-2	51W	0 – 110 FT	North Sacramento River Anchor Tower
167-3	51B	0 – 100 FT	North Sacramento River Crossing Tower
168-1	51B	0 – 100FT	South Sacramento River Crossing Tower
168-2	51W	0 – 110 FT	South Sacramento River Anchor Tower
171-2	51W	0 – 110 FT	North San Joaquin River Anchor Tower
171-3	51B1	0 – 92 FT	North San Joaquin River Crossing Tower

171-4 51B1 0 – 92 FT South San Joaquin River Crossing Tower
172-1 51W 0 – 110 FT South San Joaquin River Anchor Tower

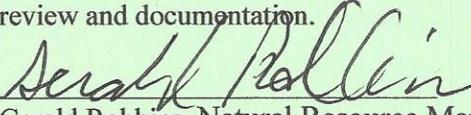
The project specifications require the coatings to be applied either by brush or mitt. Spray applications will not be permitted. Paint shall not be applied in rain, snow, fog, or mist. The paint that is to be used is Anodic Self-priming Paint (KL4400 Series) or similar paint. The contractor will be required to protect against spills or drips by laying tarps on the ground and to have spill kits on hand during the painting operation. Upon completion of the work at each tower site, the contractor shall remove all transmission line hardware coverings, containers, packaging, ground covers and other waste generated during the execution of the work. Project activities are currently scheduled for the spring of 2015.

Map(s)
See attached Maps

Figures(s)
See attached Figures

Work Order Number - 100309675

To be completed by Natural Resources Only

Action taken	
Note: All Documentation is Attached	
<input checked="" type="checkbox"/> Categorical Exclusion (CX)	<input checked="" type="checkbox"/> Integral Elements
<input type="checkbox"/> Environmental Assessment (EA)	<input checked="" type="checkbox"/> NEPA Attachment Sheet
<input type="checkbox"/> Environmental Impact Statement (EIS)	<input type="checkbox"/> Environmental Requirements/Mitigation
<input checked="" type="checkbox"/> Other Determinations:	<input type="checkbox"/> Maps/Figures
Determination: Based on my review of information provided to me concerning the proposed action as NEPA Compliance Officer, I have determined that the proposed action meets the requirements for the categorical exclusion listed above. Therefore, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation.	
 Gerald Robbins, Natural Resource Manager	<u>Dec 17, 2014</u> <input type="checkbox"/> Date Approved

bcc:	File Code:	Assigned to: LaTisha Saare	Project #: 100309675	Environmental Specialist- Date: LaTisha Saare – 12-5-14
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Integral Elements

Project Title: COTP River Crossing Tower Painting Project

Category of Action:

- **B4.6** - Additions/modifications to electric power transmission facilities.

Regulatory Requirements for a Categorical Exclusion Determination: The Department of Energy (DOE), National Environmental Policy Act (NEPA) Implementing Procedures, 10 CFR 1021.410(b) require the following determinations be made in order for a proposed action to be categorically excluded (see full text in regulation).

1. The proposed action fits within a class of action listed in Appendices A and B to Subpart D. For classes of actions listed in Appendix B, the following conditions are integral elements; i.e., to fit within a class, the proposal must not:
 - a. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
 - b. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, but may include categorically excluded facilities;
 - c. Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or un-permitted releases; or
 - d. Have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B;
 - e. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.
2. There are no extraordinary circumstances related to the proposal which may affect the significance of the environmental effects of the proposal;
3. The proposal has not been segmented to meet the definition of a categorical exclusion. The proposal is not connected to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions requiring preparation of an environmental impact statement.

Results of Review: In accordance with DOE environmental regulations (10 CFR 1021), The Western Area Power Administration (Western) has reviewed the proposed action in terms of the level of NEPA review needed. Based on this review, Western has determined the proposal is encompassed within a class of action listed in Appendix B to Subpart D (10 CFR 1021.410) which do not require preparation of either an environmental impact statement (EIS) or an environmental assessment (EA).

The proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.



**Western Area Power Administration,
SIERRA NEVADA REGION
NEPA Attachment Sheet**

Project Number
100309675

PROJECT TITLE: COTP River Crossing Tower Painting Project

EFFECTED ENVIRONMENT

The COTP River Crossing Tower Painting Project consists of painting eight towers located near the Sacramento and San Joaquin rivers. The towers occur primarily in non-native grassland and pasture habitats. These towers are located primarily in an agricultural setting within the Delta.

REVIEW ACTION

A biological field assessment was conducted for this project to determine if project activities could affect listed species or sensitive habitat. With the incorporation of Western's Standard Operating Procedures, and avoidance and minimization measures incorporated in this document, there will be no effect on listed species or their habitats.

CULTURAL AND HISTORIC RESULTS

<input checked="" type="checkbox"/>	Effects Determination -The COTP transmission line was surveyed for cultural resources before construction in 1988 and again in 2005. No cultural resources were detected or recorded in or around the vicinity of the towers as described in this CX. Project will have no effect on significant cultural resources.
<input checked="" type="checkbox"/>	This action is covered by Western's Programmatic Agreement, "Programmatic Agreement Among the Western Area Power Administration, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Concerning Emergency and Routine Maintenance Activities and Other Routine Activities at Western Facilities in California," revised March, 2010.
<input type="checkbox"/>	Mitigation required
<input checked="" type="checkbox"/>	Include in Western's annual report

BIOLOGICAL RESULTS

<input checked="" type="checkbox"/>	Studies conducted, in order to evaluate potential impacts of the proposed project on special status species and/or their habitats, included background research to determine which special-status species and their habitats may occur within the project area and a review of habitat types in the project area. A biological field assessment was conducted for this project to determine if project activities could affect listed species or sensitive habitat and a Fisheries Tech Memo was drafted that assesses the potential of the project to affect listed fish species and their habitats. Based on these assessments and with the incorporation of Western's Standard Operating Procedures, and avoidance measures incorporated in this document, there will be no effect on listed species or their habitats.
<input checked="" type="checkbox"/>	This activity is covered by Western's Letter of Concurrence for 'North Area Right of Way Operations and Maintenance Project, from Klamath County, Oregon through Alameda County, California,' amended June 2011; U.S Fish and Wildlife Service File 81420-2009-I-0743-2.
<input type="checkbox"/>	Mitigation required (see below)

COMPLIANCE RESULTS

<input checked="" type="checkbox"/>	<p>Air Quality Requirements for Volatile Organic Compounds (VOC): The Bay Area Air Quality Management District (BAAQMD) regulates emissions of VOC from architectural coatings under Regulation 8: Organic Compounds, Rule 3: Architectural Coatings (Rule 8-3). Rule 8-3 limits the amount of VOCs allowed in various types of coatings including those utilized for industrial maintenance. The industrial maintenance VOC coating limits are set at 250 grams/liter.</p> <p>The paint products identified for use contain VOCs at 65 grams/liter and are below the 250 gram/liter limit and therefore appropriate for use in this application.</p>
<input type="checkbox"/>	<p>Hardware Disposal: All associated hardware that is recyclable shall be sent for recycling. The Elverta Maintenance Facility accumulates hardware for recycling. All other material shall be disposed of in accordance to federal, State, and local regulations.</p>
<input checked="" type="checkbox"/>	<p>Waste Material Quantity Report: Submit quantities of total project waste material disposal as listed below to the Natural Resources Department after completion of work.</p> <p>(1) Sanitary Wastes: Volume in cubic yards or weight in pounds.</p> <p>(2) Hazardous or Universal Wastes: Weight in pounds.</p> <p>(3) PCB Wastes (If applicable): Weight in pounds.</p> <p>(4) Other regulated wastes (e.g., lead-based paint or asbestos): Weight in pounds (specify type of waste in report).</p>

MITIGATION

<input type="checkbox"/>	<p>Other Mitigation: Not Required</p>
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Western Area Power Administration Sierra Nevada Region	Environmental Requirements for the COTP River Crossing Tower Painting Project	Project Number 100309675
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ITEMS CHECKED ARE APPLICABLE TO THIS PROJECT.

General

<input checked="" type="checkbox"/>	Prior to maintenance activities during the nesting season (February 1 – August 31), a qualified biologist will survey the proposed maintenance sites to determine whether nesting raptors or migratory birds are present. If no nesting raptors or migratory birds, maintenance activities can proceed. Survey results will be valid only for the nesting season in which they were conducted and additional surveys would be needed for each additional season that work must be conducted.
<input type="checkbox"/>	Routine maintenance activities will be avoided from mid-March through mid-June in the vicinity of structures.
<input type="checkbox"/>	Road maintenance operations will be conducted to minimize soil erosion. The United States Forest Service's Best Management Practices, Forest Practices, and Forest Practices Rules of the California Department of Forestry will be implemented where practical.
<input type="checkbox"/>	Culverts will be sized to match storms that may occur during the life of the road to minimize the potential for access road washouts under high intensity storms.
<input type="checkbox"/>	Excavated material will not be stock piled or deposited on or near stream banks, lake shorelines, or other water course perimeters where they could be washed away by high water or storm run-off or could significantly impact the water course.
<input type="checkbox"/>	Vegetative management plans will be followed as appropriate.
<input type="checkbox"/>	In areas where excavation is not required, vegetation will be left in place whenever possible and original contours maintained in an undisturbed condition.
<input type="checkbox"/>	Habitat diversity will be maintained to the greatest extent feasible.
<input type="checkbox"/>	Brush blades will be used on bulldozers in clearing operations where such use will help preserve the cover crop of grass, low-growing brush, etc.
<input type="checkbox"/>	Dispose of all cleared vegetation in an appropriate manner.
<input checked="" type="checkbox"/>	The biologist will determine whether a sensitive habitat is present at the maintenance site. If special status species are identified in the area, maintenance will receive approval from Natural Resources prior to initiating any maintenance.
<input checked="" type="checkbox"/>	Natural Resources will be contacted immediately: a. If there is a "take" of a special status species or action affecting their critical habitat, and/or b. If archeological, paleontological, or historic evidence is found.
<input checked="" type="checkbox"/>	No paint or permanent discoloring agents will be applied to rocks or vegetation.
<input checked="" type="checkbox"/>	If used, survey stakes will be removed as a part of the final clean up.
<input type="checkbox"/>	All work on access and maintenance roads must stay within the existing prism of the roads.

Perennial Streams and Rivers

<input checked="" type="checkbox"/>	<p>The following activities will be prohibited at all times within 100 feet of a seep, spring, pond, lake, or river:</p> <ul style="list-style-type: none"> • Vehicle access, except on existing access and maintenance roads, unless approved by Natural Resources • Dumping, stockpiling, or burying of any material, except as required for specific O&M activities (e.g., rip-rap) • Mixing of pesticides, herbicides, or other potentially toxic chemicals • Open petroleum products
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	Equipment will be stored, fueled, and maintained in a vehicle staging area 300 feet or the maximum distance possible from any seep, spring, pond, lake, river, stream, marsh, or their associated habitats. Vehicles will be inspected daily for fluid leaks before leaving the staging area.
<input checked="" type="checkbox"/>	All spills of fuel or hydraulic fluid would be immediately cleaned up according to Western's guidelines for hazardous material handling.
<input checked="" type="checkbox"/>	<p>The following avoidance measures shall be applied to this project:</p> <ul style="list-style-type: none"> • Paint shall not be applied in rain, snow, fog, or mist or during sustained winds (> 20 mph). • Spray applications are not permitted and coatings will be applied either by mitt or brush in the lower 110-feet of the tower. Western, or its contractor, will adhere to the Standard Operating Procedures and Project Conservation Measures defined in their North Area Right-of-Way Operations and Maintenance Program. • The following additional measures shall be implemented to protect against spills of potentially toxic materials: • Prior to the start of project activities, all personnel will participate in environmental awareness training which will inform them of the sensitive habitats within the project area, the species that have the potential to occur in the project area, and the avoidance and minimization measures that are to be adhered to during project activities. Any new crew members that start after project activities have started will be given the environmental awareness training prior to starting work on site. • Plastic will be placed under towers and at least 20-feet outside of the tower foundation. For those towers that occur within 100 feet of a canal or ditch, silt or other type of fencing will be installed between the tower and the feature. The fence will be at least two feet tall and at least 20 feet (as possible) from the tower. Plastic from under the tower will be secured over the fencing in order to direct any spills away from the feature and back under the tower. • A qualified biological monitor will be on-site for any tower painting activities within 100 feet of a canal, drainage, or other water way. The monitor will have the authority to stop and/or redirect project activities in coordination with the project manager and Western's Natural Resources staff to ensure the protection of sensitive resources. The monitor will complete daily reports/logs summarizing activities and environmental compliance.

Migratory Birds and Raptors

<input checked="" type="checkbox"/>	Under the Migratory Bird Treaty Act of 1918, migratory bird species and their nests and eggs are protected from injury or death. Impacts to migratory bird nests (including state listed Swainson's hawk, other raptors, and state listed bank swallow) shall be avoided during the nesting season (February 1 to August 31). If project activities occur during the nesting season, Western will survey the project area for migratory bird nests prior to project activities and establish appropriate buffers around any active nests that may potentially be disturbed. If work must be conducted within these buffers, a Western supplied biological monitor will be on site for project activities within the buffers. If the biological monitor determines that activities are likely to cause nest impacts or nest abandonment, then project activities in the area shall be postponed or adjusted until nestlings have fledged, the nest is no longer active, or the activities are not likely to cause nest impacts or nest abandonment.
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Giant Garter Snake

<input checked="" type="checkbox"/>	<p>The following measures will be implemented to avoid impacts to giant garter snake (GGS):</p> <ul style="list-style-type: none"> • Prior to the start of project activities, all personnel will participate in environmental awareness training which will inform them of the sensitive habitats within the project area, the species that have the potential to occur in the project area, and the avoidance and minimization measures that are to be adhered to during project activities. Any new crew members that start after project
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	<p>activities have started will be given the environmental awareness training prior to starting work on site.</p> <ul style="list-style-type: none"> • Levee banks with ground squirrel holes and other upland habitat with suitable burrows for refuge during the GGS dormancy period will be avoided. Movement of heavy equipment will be confined to existing roadways and tower pads to minimize habitat disturbance. Vegetation management will be confined to the minimum area necessary to facilitate O&M activities. • GGS aquatic and upland habitats will be flagged as environmentally sensitive areas by an approved biologist within or adjacent to the disturbance footprint. A biological monitor will be present for activities adjacent to these areas.
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Swainson's Hawk

<input checked="" type="checkbox"/>	From April 1 to July 31 intensive disturbance will be prohibited within 0.25 miles of a Swainson's hawk nest until after the young have fledged or until it is determined by a qualified biologist that the activities will not adversely affect adults or young. This buffer may be adjusted, as assessed by a qualified biologist, based on changes in sensitivity exhibited by birds over the course of the nesting season and the type of O&M activity performed
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Burrowing Owl

<input checked="" type="checkbox"/>	From February 1 to August 31 operations and maintenance (O&M) activity will be prohibited within 250 feet of burrowing owl nesting dens. From September 1 through January 31, disturbance will be prohibited within 160 feet of burrowing owl dens. To date, no active burrowing owl dens have been detected within or adjacent to towers that are to be painted.
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Compliance Regulatory Requirements

<input checked="" type="checkbox"/>	No violations of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders will be permitted.
<input checked="" type="checkbox"/>	There will be no uncontrolled or un-permitted releases of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products to avoid adversely affecting environmentally sensitive resources.
<input checked="" type="checkbox"/>	In the event of a Hazardous Material/Waste spill environmental services will be contacted, dispatch notified, and the appropriate Federal, State, and local regulating authority notified depending on the type and size of the spill (For further guidance, please see Natural Resources).
<input checked="" type="checkbox"/>	Hazardous Materials/Waste on-site to consider: Fueling of equipment; In the right of way, place spill drip pans (or similar) below fueling areas, spill kit and tools available nearby to stop the flow of fuel spills, and employees trained in spill response.
<input checked="" type="checkbox"/>	Hazardous Materials/Waste need to be removed off site for disposal/recycling
<input type="checkbox"/>	Piping and oil sampling required
<input checked="" type="checkbox"/>	Safety Data Sheets shall be available at all times with hazards communicated to project personnel.
<input type="checkbox"/>	Erosion control measures to be taken to prevent sediment from reaching river
<input type="checkbox"/>	Soil Sampling