National Park Service
U.S. Department of the Interior

Pacific West
Regional Office
Oakland

1111 Jackson Street
Suite 700
Oakland, CA 94607
510-817-1300 phone
510-419-0197 fax

PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-PP)

MAR 25 2010

Memorandum

To: Superintendent, Whiskeytown National Recreation Area

From: Acting Regional Director, Pacific West Region

Subject: Environmental Compliance for North Area Rightof-Way Maintenance

The finalized *Finding of No Significant Impact* for that portion within the park, of a larger maintenance program to be administered by Western Area Power Administration (WAPA), was received March 23, 2010. Thank you for your recommendation.

Our understanding is that while the environmental compliance was prepared by WAPA, determinations of non-impairment of park values were rendered by the NPS. We also note that separate decisions for other program components on USFS and BLM lands were prepared and have been approved.

The subject FONSI is approved.

Rory D. Westberg

Rory D. Westberg

Attachment

cc:
PWR-LP

FINDING OF NO SIGNIFICANT IMPACT

North Area Right-of-Way Maintenance Program

WHISKEYTOWN UNIT – WHISKEYTOWN-SHASTA-TRINITY NATIONAL RECREATION AREA SHASTA COUNTY, CALIFORNIA

The Department of Energy, Western Area Power Administration (Western), has prepared this North Area Right-of-Way Maintenance Program Finding of No Significant Impact (FONSI) for the activities associated with the North Area Right-of-Way Maintenance Program. Western's North Area Right-of-Way (ROW) is located throughout northern and central California, a portion of which lies within the Whiskeytown National Recreation Area. This FONSI is a summarized statement of the project purpose and need, the Proposed Action, alternatives considered, potential project-related impacts, and measures to minimize environmental harm.

Background

Within its Sierra Nevada Region, Western Area Power Administration (Western) owns, operates, and maintains several high-voltage transmission including portions of the Central Valley Project (CVP) and the entire Pacific Alternating Current Intertie (PACI) transmission lines. Additionally, Western operates and maintains (and has partial ownership of) the California-Oregon Transmission Project (COTP), which is owned by the Transmission Agency of Northern California (TANC) and includes a number of communication facilities and three 500-kV lines between Klamath County, Oregon, and San Joaquin County, California. Collectively, the CVP, PACI, COTP, seven communication facilities, and associated access roads are referred to as Western's North Area Right-of-Way (ROW), and comprise the project area.

The project area traverses the Whiskeytown National Recreation Area. In total, approximately 9.2 miles of existing transmission line are located on NPS land. Existing Western transmission lines on NPS land that are part of the Proposed Action include: Carr-Keswick #1&2 and Trinity-Carr as well as the Whiskeytown Switchyard. There are no Western communication facilities on NPS land.

Many of the North Area ROW transmission lines pass through rugged and densely vegetated areas requiring vegetation maintenance. Pursuant to section 7 of the federal Endangered Species Act (ESA), Western has a programmatic biological opinion (BO) (USFWS 1998) from the U.S. Fish and Wildlife Service (USFWS) for existing operation and maintenance (O&M) activities. Western also has a current programmatic agreement (PA) with the California State Historic Preservation Officer (SHPO), pursuant to Section 106 of the National Historic Preservation Act (NHPA), for existing O&M activities. The PA also addresses Western-maintained COTP and PACI facilities. These documents address current routine ROW maintenance along Western's transmission ROWs.

Western's North Area ROW Maintenance Program (the project) serves to update the existing O&M program to include all transmission lines as well as seven communication facilities into one comprehensive program. In addition, this comprehensive O&M program includes additional maintenance activities that are outside the scope of the

existing BO and PA. The environmental assessment (EA) and associated documents for this master program will support further ESA and NHPA consultation required for the additional transmission systems and maintenance activities and is intended to streamline other regulatory and permitting requirements.

Purpose and Need

The purpose of the North Area ROW Maintenance Program is to maintain existing transmission line and legal access road ROWs in a condition to ensure that Western's maintenance crews have safe and all-weather access to transmission line structures. Western has designed this maintenance program to balance environmental protection with system reliability and compliance with the National Electric Safety Code (NESC), Western Systems Coordinating Council (WSCC) requirements, North American Electric Reliability Council (NERC) reliability standards, Institute of Electrical and Electronics Engineers (IEEE) standards, and Western directives for maintaining system reliability and protection of human safety. In meeting this purpose, Western's objectives are to maintain its transmission line ROWs to:

- Prevent operational hazards;
- Provide access for maintenance;
- Protect facilities from fire;
- Control the spread of noxious weeds and protect environmental quality;
- Adhere to principles of Western's IVM Program;
- Establish stable, low-growing native plant communities under the ROW;
- Develop a technically and economically efficient program;
- Protect public and worker safety;
- Maintain sound relationships with landowners and managers; and
- Streamline regulatory permitting activities.

The need for the Proposed Action includes:

- Eliminating the threat for vegetation to interfere with the lines and towers. Vegetation near transmission lines may pose a threat to public safety and the environment from arcing (which can cause fires) and trees falling onto the transmission lines;
- Controlling vegetation in a cost-effective manner that would benefit the public and natural ecosystems;
- Maintaining the transmission line and legal access road ROWs to facilitate year-round access to transmission-line structures.

Selected Action and Alternatives

Four alternatives were identified for evaluation in the EA. Two (i.e., Comprehensive Vegetation Removal Alternative and Prohibition of Herbicide Use Alternative) were eliminated from full evaluation in the EA because they did not reasonably achieve the project objectives and reduce potential adverse effects. The two remaining alternatives are the Proposed Action, which is the selected alternative, and the No-action Alternative.

Western will implement the Proposed Action alternative that was fully evaluated in the EA and made available for public and interagency review. All public and agency comments have been addressed. This FONSI pertains only to the NPS portion of the larger North Area ROW project and does not limit what other agencies or landowners may do.

Proposed Action

Western's O&M project serves to produce a Master O&M Program that incorporates Western's Integrated Vegetation Management (IVM) Program, which promotes the use of several methods as one management system to control unwanted vegetation within Western's ROWs. The IVM Program includes a number of options for vegetation control, including cultural/natural control, physical/mechanical control, biological control, and chemical control. The IVM Program was discussed with land managers and resource agencies to develop a specific O&M Plan for each land manager. The Master O&M Program contains specific O&M Plans for National Park Service (NPS), U.S. Forest Service, Bureau of Land Management, and private lands. These specific O&M plans would provide guidance to Western on the preferred maintenance within these lands.

Proposed O&M activities on NPS land may include, but are not limited to, facility inspection/repair (e.g., ground and aerial patrols, replacement of equipment within the confines of the existing fenced substation or facility perimeter, insulator maintenance), vegetation management (e.g., manual control, mechanical control), equipment upgrades (e.g., reconductoring, tower replacement), and access road improvements. Operation and maintenance activities were divided into three activity categories: Category A - Inspection and Minor Maintenance Activities, Category B - Routine Maintenance Activities, and Category C - New Infrastructure and an analysis of potential environmental effects of activities within each category was presented in the EA.

Comprehensive standard operating procedures (SOPs) and resource-specific project conservation measures (PCMs) intended to avoid or minimize impacts were incorporated into the Proposed Action (refer to Section 2 of the EA).

No-action Alternative

Under the No Action Alternative, Western would continue its need-driven management approach using current methods for ROW maintenance. Under a need-driven management approach, Western would trim, mow, clear, remove, and dispose of vegetation along ROW segments as control needs are identified through periodic line patrols. Western would perform vegetation management using the current mix of manual and mechanical methods to control vegetation on transmission line and access road ROWs. The No Action Alternative also includes the current practice of spot application of herbicides. Access road repairs would be performed as needed. Transmission system maintenance activities would consist of regular aerial and ground patrols to locate problems, repairs to correct problems, and preventative maintenance. These are all consistent with the 1998 programmatic BO.

The primary differences between the Proposed Action and the No Action Alternative are the broader application of herbicide use, the installation of fiber optic cable, tower relocation/realignment, and cell tower installation. The Proposed Action also provides a process to streamline the regulatory process for future O&M activities.

The Environmentally-Preferred Alternative

The Environmentally-Preferred Alternative is the alternative that would:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Ensure for all Americans, safe, healthful, productive and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our natural heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The National Park Service has determined that the Proposed Action is the Environmentally Preferred Alternative. Based upon the above six criteria, the Proposed Action achieves the greatest degree of environmentally preferred benefits.

- Criterion 1 is achieved in greater magnitude by Alternative A as the selected action aids in the continuation of natural environmental processes;
- Criterion 2 is achieved in greater magnitude by the Proposed Action because promotion of low-growing vegetation is aesthetically preferred to periodic vegetation clearing.
- Criterion 3 is achieved in greater magnitude by the Proposed Action because it retains biological habitat while ensuring safe access to the transmission system.
- Criterion 4 is achieved by both alternatives, because it is Western's practice to avoid impacts to cultural resources.
- Criterion 5 is not applicable to either alternative.
- Criterion 6 is not applicable to either alternative.

Basis for Decision

When compared to the No Action Alternative, the Proposed Action will provide a net environmental benefit and will meet the purpose and need of the project. The Proposed Action is consistent with the management direction and mission framework described in the NPS Management Policies (2006) and the Whiskeytown Unit General Management Plan (1999). Specifically, the Proposed Action would aid in achieving reductions in noxious weed populations and rehabilitation of unneeded access roads as well as provide comprehensive information on the cultural and biological resources within Western's ROWs on park land.

Standard Operating Procedures (SOP) and resource-specific Project Conservation Measures (PCM) have been incorporated into the Proposed Action to avoid and minimize any potentially resultant environmental effects. A biological assessment (BA) was submitted to the USFWS, and another was submitted to the National Marine Fisheries Service (NMFS). Each agency has provided a letter of concurrence that the

Proposed Action is not likely to adversely affect special-status species under their jurisdiction. These letters were issued by USFWS and NMFS on October 9 and December 23, 2009, respectively. A Programmatic Agreement for this undertaking was executed with the SHPO on March 1, 2010.

The North Area ROW Maintenance Program EA documents the environmental analysis and conclusions upon which this decision is based.

Why the Selected Action Will Not Have a Significant Effect on the Human Environment

The EA evaluated potential project-related impacts to habitats, plants, vegetation communities, wildlife, fishes, special-status species, cultural resources, land uses, recreation, aesthetics, water resources, geology and soils, public health, air quality, the ambient noise environment, and transportation. Without implementation of SOPs and PCMs, the Proposed Action could result in adverse effects. Western has determined that the Proposed Action can be implemented with no significant adverse effects to these resources through implementation of the SOPs and PCMs provided in the EA. The USFWS and NMFS have has concurred with Western's SOPs and PCMs, which comprise comprehensive impact-avoidance and minimization measures for most activities and most species, but also include the requirement for informal or potentially formal consultation for certain major activities and certain special-status species.

The following sections describe potential adverse effects of the project; however, implementation of SOPs, PCMs and mitigation would avoid, minimize, or mitigate impacts to less-than-significant levels.

Biological Resources: Destruction of or damage to special-status plants or habitats that support special-status wildlife; reproductive failure; loss of general plant diversity at a local level; loss of habitat structure and diversity affecting fish and wildlife; introduction or spread of noxious weeds; bird mortality at cell towers through collision, misorientation, or disorientation; degradation of water quality in jurisdictional and non-jurisdictional wetlands and waters potentially affecting sensitive wildlife that depend on aquatic features;

Air Quality: Increases in air pollution, dust/particulates, or other airborne contaminants exceeding state and/or federal standards that could affect either human health or nearby crops.

Cultural Resources: Damage to or loss of archaeological deposits or artifacts, loss or degradation of a traditional cultural property or sacred site, or disturbance to human remains outside of cemeteries.

Recreation: Damage to fences or gates, damage to non-Western utilities through Western actions; impacts to special-use areas such as wildlife refuges; impacts to or conflicts with existing recreational areas or substantial loss of recreational uses.

Aesthetics: Degradation of views from sensitive viewer locations, increased air pollution, substantial changes to the scenic quality of an important landscape.

Water Resources: Contamination of surface water though erosion or stormwater runoff, or to ground water through leaching or subsurface migration of pollutants; depletion of groundwater resources or interference with groundwater recharge; increased long-term susceptibility to onsite or offsite flooding, erosion, or siltation through altered surface hydrology.

Geology and Soils: Increase in the probability or magnitude of mass geologic movements such as slope failures, slumps, or rockfalls; adverse effects to state-identified rock outcrops of significance; accelerated erosion causing rills and/or gullies; increased slope instability.

Public Health and Safety: Hazards to workers and neighbors from improper use of herbicides or spills of other toxic chemicals, or from falling trees, excavations, fires, and exposure to electric and magnetic fields.

Noise: Noise levels that exceed applicable local, state, or federal regulations; noise levels that cause reproductive failure in wildlife; excessive ground-borne vibration.

Traffic and Transportation: Major traffic delays, excessive road dust, road damage, road closures, or adverse effects to air-traffic patterns.

Non-impairment of Park Resources

No project is allowed to impair National Park resources or values, according to the NPS Organic Act of 1916 and NPS General Authorities Act of 1970 (as amended in 1978). The National Park Service may choose to take an action resulting in some impact, even a measurable or significant impact, but "impairment" is strictly prohibited (NPS Management Policies 2006). The selected action contains elements with the potential to impact resources, but the nature of the impacts is limited in context, and not expected to impair National Park Service resources or values.

The impacts resulting from the selected action that are documented in the EA and summarized above will not have significant impacts on resources or values key to the natural or cultural integrity of the park. The selected action, with SOPs and PCMs, will not impair park resources or values. The selected action will not violate the NPS Organic Act.

Public Review and Consultation

As lead federal agency, it is Western's practice to issue a Draft and Final EA. People were invited to review and comment on the proposal during the 30-day review of the Draft EA (July 30, 2008 to August 28, 2008). One comment from a member of the public was received; it requested addition of Interstate 5 to the project overview map (EA Figure 1-1). Comments from the U.S Army Corps of Engineers, State Water Resources Control Board, and CalTrans were considered in the Final EA.

Decision

Based on information contained above and the capability of the SOPs and PCMs to avoid or reduce potential impacts, it is the determination of the National Park Service that the selected action would not constitute a major federal action that would significantly affect the quality of the human environment. Floodplains and wetlands are not adversely affected by this project. No adverse cumulative effects are anticipated; connected actions identified in the environmental assessment have no significant effects associated with them. The Proposed Action would not violate federal, state, or local laws or requirements imposed for environmental protection. Therefore, in compliance with National Environmental Policy Act regulations, an Environmental Impact Statement is not required; the selected action as detailed in the Environmental Assessment may be implemented immediately.

Recommended: Jim T. Milestone 3-15-2010

James Milestone
Superintendent, Whiskeytown
National Recreation Area

Date

Approved: Rory D. Westburg 25 MAR 2010

Rory Westburg
Acting Regional Director
Pacific West Region

Date