



Categorical Exclusion Determination

Western Area Power Administration

U.S. Department of Energy



<u>Proposed Action Title:</u>	Curecanti-South Canal and South Canal-Montrose 115-kV Transmission Lines Right-Of-Way/Access Road Maintenance and Structure/Gate Replacements
<u>WAPA Region:</u>	Rocky Mountain
<u>Location (County/State):</u>	Montrose County, Colorado
<u>CX Determination Number:</u>	2026-RMR-030 (RMR Project Number: 2023-056)
<u>CX Determination Expiration Date*:</u>	December 31, 2030

**CX is valid until the date above (no longer than five years from when document was signed) or completion of work started prior to the expiration of the CX Determination, unless there are substantial changes to the scope of work, location, or applicable regulations. If such changes occur prior to the expiration of the CX, the Region Environmental Program will review the analysis to ensure the CX is still applicable.*

Proposed Action Description:

Western Area Power Administration (WAPA), Rocky Mountain Region (RMR), proposes to conduct routine access road and transmission line right-of-way (ROW) maintenance, and replace existing structures and gates between the Curecanti Substation and South Canal Substation on the Curecanti-South Canal 115-kV Transmission Line and between the South Canal Substation and Montrose Substation on the South Canal-Montrose 115-kV Transmission Line in Montrose County, Colorado.

Routine maintenance of existing access roads, crossings, landings, and other ROW features will be completed as necessary within approved work areas to facilitate safe access to the transmission line. Examples of routine maintenance activities that may be completed include: blading; grading; removal of rocks, vegetation, and other obstacles impeding safe travel; installation, repair, and replacement of water bars, rip-rap, and other erosion control measures; cleanout, repair, and in-kind replacement of culverts and other drainage features; washout repair; landing maintenance; installation and maintenance of gates; and soil stabilization. Equipment used for this component of the proposed action may include motor graders, bulldozers, excavators, dump trucks, compactors, skid-steers, and work trucks.

Existing structures that have been identified as structurally deficient will be replaced. The new structures will be 5 to 10 feet taller than the existing structures and have minor structural updates to meet current WAPA design standards, but they will be visually similar to the existing structures. The new structures will be placed in the existing structure holes whenever possible. The full scope of the structure replacements will include removing the existing structures, re-auguring the existing structure holes or auguring new structure holes, installing the new wood structures, backfilling the structure holes, and installing new hardware. Equipment used for this component of the proposed action may include bucket trucks, truck-mounted augers and cranes, skid-steer loaders, utility trucks, pole trailers, and equipment trailers.



Work will occur on private lands and public lands managed by the Bureau of Land Management-Uncompahgre Field Office. Work will be confined to WAPA's existing access road and transmission line ROWs; no new roads will be constructed, and work will be focused on previously disturbed locations. Work may occur at any time prior to the expiration date.

Environmental Requirements during Project Implementation:

- 1) If the scope of work of this project changes, RMR's Environment Department must be contacted to determine whether additional environmental review is required.
- 2) **This Categorical Exclusion expires on December 31, 2030.** If all project work has not been completed by the expiration date, or if the need for an environmental compliance extension is anticipated, RMR's Environment Department must be contacted for an updated environmental review.
- 3) **ENVIRONMENTAL REQUIREMENTS IN GUNNISON SAGE-GROUSE HABITAT**
 - a) **ACCESS ROAD MAINTENANCE ONLY:** The Environmental Requirements Area maps provided to WAPA's maintenance crews include biological resource boundaries. Maintenance crews must adhere to the following restrictions within the biological resource boundaries to avoid and minimize disturbance to breeding and nesting Gunnison sage-grouse and its critical habitat:
 - i) Only conduct maintenance activities outside of the GUSG lekking, nesting and brood rearing season of **March 1 to June 1**.
 - ii) Limit vehicle speeds to 35 mph within GUSG habitat to minimize potential vehicle collisions with GUSG (Tessmann, et al., 2004).
 - iii) During the brood rearing season from **June 1 to July 15**, authorized work hours are limited to 2 hours after sunrise to 1 hour before sunset, when hens with broods are least active. (Gunnison Sage-grouse Rangewide Steering Committee. 2005).
 - iv) No work will be performed or authorized except for the activities described herein.
 - v) Vehicles will use existing access roads and will remain on them, except when necessary to conduct specific work actions described in the proposed action.
 - vi) No wetlands, riparian areas, brooks, rivers, or creeks shall be permanently disturbed. Water resources may be temporarily impacted by installing, repairing, or maintaining, water bars or culverts.
 - vii) All equipment used shall be cleaned prior to use in the area to prevent transporting of invasive plants or noxious weed seeds.
 - viii) To minimize impacts on the environment and prevent damage to access roads, operations will not be permitted during periods of heavy rain, when soils are wet, and when excessive soil damage may occur due to unsuitable operating conditions. Specifically, if equipment would create ruts in excess of six (6) inches deep, the soil shall be deemed too wet and work will cease until the area dries out.
 - ix) WAPA will notify its employees that they are working within GUSG CH and advise them to avoid or minimize any potential disturbance to sagebrush and other shrubs. If present, sagebrush and other shrubs will be identified and avoided or minimized when positioning equipment, if positioning off of the road is even necessary.



- b) **STRUCTURE AND GATE REPLACEMENTS:** The Environmental Requirements Area maps provided to WAPA's maintenance crews include biological resource boundaries. Maintenance crews must adhere to the following restrictions within the biological resource boundaries to avoid and minimize disturbance to breeding and nesting Gunnison sage-grouse and its critical habitat:
- i) Work must not occur during the Gunnison sage-grouse lekking, nesting, and early brood rearing season of **March 1 through July 15**;
 - ii) Avoid or minimize any potential disturbance to sagebrush and other shrubs. If present, sagebrush, and other shrubs will be identified and avoided or minimized when positioning equipment, if positioning off the road is even necessary.
 - iii) Vehicles will use existing access roads and will remain on them, except when necessary to conduct specific work actions described in this CX.
 - iv) No wetlands, riparian areas, brooks, rivers, or creeks shall be disturbed. Intermittent streams may be disturbed to install, repair, or maintain water bars or culverts.
 - v) All equipment used shall be cleaned prior to use in the area to prevent transporting of invasive plant or noxious weed seeds.
 - vi) To minimize impacts to the environment and prevent damage to access roads, operations will not be permitted during periods of heavy rains, when soils are wet, and when excessive soil damage may occur due to unsuitable operating conditions. Specifically, if equipment would create ruts in excess of six inches deep, the soil shall be deemed too wet, and work will cease until the area dries out.
- 4) **The Environmental Requirements Area maps provided to WAPA's maintenance crews include biological resource boundaries.** Road maintenance will be restricted to the roadbed between structures 14-6 and 14-9 on the South Canal-Montrose transmission line to protect a nearby population of the Federally Endangered Clay-loving wild buckwheat (*Eriogonum pelinophilum*).
- 5) **The Environmental Requirements Area maps provided to WAPA's maintenance crews show the access roads and ROW areas approved for maintenance.** The approved work areas include indicated access roads to a width of 100 feet (50 feet either side of road centerline) on BLM-UFO lands and to a width of 50 feet (25 feet on either side of the road centerline) on private lands; and indicated ROW areas to a width of 150 feet (75 feet on either side of the transmission line centerline) centered on WAPA's Curecanti-South Canal 115-kV Transmission Line, and to a width of 100 feet (50 feet on either side of the transmission line centerline) centered on WAPA's South Canal-Montrose 115-kV Transmission Line. If clarification of maps is required, please contact RMR's Archaeologist at (970) 286-3523 or RMR's Natural Resource Specialist at (970) 473-5586.
- 6) **The Environmental Requirements Area maps provided to WAPA's maintenance crews and/or contractor(s) include cultural resource boundaries.** No ground disturbance is allowed within these areas. All access within these cultural resource boundaries must be limited to existing



access roads. If ground disturbance within these areas is necessary, an RMR Archeologist must be contacted at (970) 286-3523 or (970) 218-4946. No ground disturbance within these cultural resource boundaries is authorized until written notification to proceed is provided by an RMR Archeologist.

- 7) Only in-kind culvert replacement and crossing maintenance is authorized. If culverts or crossings must be enlarged, expanded, or placed in new locations, RMR's Environment Department must be contacted to determine whether additional environmental review is required.
- 8) If rip-rap or other fill must be placed within waters of the United States (within wetland boundaries or below the ordinary high-water mark of surface waters), RMR's Environment Department must be contacted to determine whether additional environmental review is required.
- 9) Any injured or orphaned birds and all observed active nests must be immediately reported to RMR Environment at (970) 342-6462 or (970) 473-5586. Any dead birds must be reported to RMR Environment within twenty-four (24) hours of discovery. Additional documentation, such as photographs and GPS coordinates, may be requested to support RMR's reporting requirements to the U.S. Fish and Wildlife Service.
- 10) If any cultural resources are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and an RMR Archeologist must be contacted immediately at (970) 286-3523 or (970) 218-4946. Work in the area of discovery must not resume until notification to proceed is provided by an RMR Archeologist.
- 11) If any possible human remains are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and an RMR Archeologist must be notified immediately at (970) 286-3523 or (970) 218-4946 (no later than 24 hours from the time of discovery). A reasonable effort must be made to protect the remains from looting and/or further damage. Work in the area of discovery must not resume until notification to proceed is provided by an RMR Archeologist.
- 12) Vehicles and equipment (trailers, trucks, UTVs, etc.) will not be moved between work areas without first taking reasonable measures to ensure they are free of soil, seeds, vegetation matter, or other debris that could contain noxious weed seeds.
- 13) Activities involving the use of fuel, oil, hydraulic fluid, or other petroleum products must comply with RMR's Spill Response Plan (SRP).
- 14) To prevent the transport of non-native and invasive plants and animals, including noxious weeds and aquatic nuisance species, work crews must thoroughly wash all vehicles and equipment (trailers, trucks, UTVs, etc.) before entering the action area and working on the project.

Categorical Exclusion(s) Applied (Number and Title):



B1.3 Routine maintenance

Findings:

For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see 10 CFR 1021.102 and Appendix B to [10 CFR Part 1021](#), and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of [DOE's National Environmental Policy Act Implementing Procedures](#) (Jun. 30, 2025).

Requirements and guidance in 10 CFR 1021.102 and DOE's NEPA Implementing Procedures: (See full text in regulation and in Implementing Procedures)



The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B or C of DOE's NEPA Implementing Procedures (June 30, 2025).

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures. Additionally, for CXs adopted pursuant to NEPA Section 109 (see DNIP, Appendix C), the originating Federal agency's integral elements or extraordinary circumstances must be in accordance with the applicable requirements.



There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.



The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: *For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on [DOE's Section 109 webpage](#).]*



Determination:

Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other requirements and guidance set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

WAPA Authorized Official Signature:

James Wood, Regional Environmental Manager
Rocky Mountain Region
Western Area Power Administration