Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

Above-Ground Routine Transmission Line Maintenance

A. Brief Description of Proposal:

Western Area Power Administration (WAPA), Rocky Mountain Region (RMR), has identified certain routine transmission line maintenance projects which require little or no environmental review and resource agency coordination. WAPA's RMR includes in this determination all routine maintenance activities on transmission lines which typically occur above-ground within the existing structure footprint and will cause little or no ground surface disturbance. This includes structure member inspection, maintenance and/or installation, removal and repair of crossarms, x-braces, and insulators.

Typical transmission line maintenance activities considered above-ground class of actions that would cause little or no ground surface disturbance may include, but are not limited to:

- (1) Line Patrol;
- (2) Climbing inspection and tightening hardware on wood and steel transmission line structures;
- (3) Repair of overhead ground wire, overhead fiber optic line, or conductor and appurtenances (e.g., attachment hardware);
- (4) Replacement or placement of aircraft warning devices;
- (5) Replacement or cleaning of insulators;
- (6) Installation of bird guards;
- (7) Replacement of crossarms on wood pole transmission line structures;
- (8) Replacement or repair of steel members of steel transmission line structures;
- (9) Inspection of hardware on wood and steel transmission line structures;
- (10) Installation, repair or replacement of x-braces and knee-braces;
- (11) Removal or installation of structure mile markers;
- (12) Dampener installation;
- (13) Installation or repair of bedrails;
- (14) Installation or repair of jumper cables; and

Note: Equipment used for above-ground routine maintenance activities listed above would consist of rubber-tired vehicles such as pickup trucks, bucket trucks, or cranes.

- (15) Patrol, transport, and other work using tracked vehicles over the snow that does not disturb underlying soil.
- B. Number and Title of the Categorical Exclusion Being Applied: (See text in 10 CFR Part 1021, Subpart D.)

B1.3. Routine Maintenance.

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive,

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair or replacement;
- (d) Reroofing;
- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- (f) Routine replacement of high-efficiency particulate air filters;
- (g) Inspection and/or treatment of currently installed utility poles;
- (h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 ("Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions") or its successor;
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- (p) Removal of debris.
- C. <u>Regulatory Requirements in 10 CFR 1021.410 (b)</u>: (See full text in regulation and attached checklist.)
 - (1) The proposed action fits within a class of actions listed in Appendix A or B to Subpart D.

Rocky Mountain Region, Western Area Power Administration

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

For classes of actions listed in Appendix B, the following conditions are integral elements. To fit within a class, the proposal <u>must not</u>:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders;
- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities;
- 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 unpermitted releases;
- Have the potential to cause significant impacts on environmentally sensitive resources. An environmentally sensitive resource is typically a resource that has been identified as needing protection through Executive Order, statute, or regulation by Federal, State, or local government, or a federally recognized Indian tribe. An action may be categorically excluded if, although sensitive resources are present, the action would not have the potential to cause significant impacts on those resources (such as construction of a building with its foundation well above a sole-source aquifer or upland surface soil removal on a site that has wetlands). Environmentally sensitive resources include, but are not limited to, those listed in paragraph B. (4) (see Attachment A).
- (2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- (3) The proposal is not "connected" to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

D. Special Stipulations Pertaining to the Proposal:

This Categorical Exclusion (CX) is only valid if accompanied by a project-specific memorandum issued by WAPA's Environmental Division. The only exception is line patrol, which does not require prior review by WAPA's Environmental Division.

This CX is valid for 1 year after the signature date or until an updated version is executed by the Environmental Division, whichever comes first.

To comply with the Migratory Bird Treaty Act, work should be scheduled outside the March 1 to July 31 general nesting period. If work is to be done during this period, contact WAPA's Environmental Division at least 14 calendar days before the work is scheduled so that they may arrange for a pedestrian survey to be conducted no more than 5 calendar days in advance of the maintenance crews to identify active nests that are to be avoided.

No active avian nests will be disturbed or damaged. An avian nest becomes active when the first egg is laid, and remains active until all offspring have fledged and the nest is empty. Inactive nests

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

that do not belong to threatened species, endangered species, or eagles may be removed and destroyed in accordance with WAPA's Avian Protection Plan (APP). Contact WAPA's Environmental Division prior to nest removal to ensure conformance with the APP.

Installation of gates is limited to when no new posts holes are required. New posts may be installed in the existing hole of the post that is proposed to be replaced.

No tracked vehicles (bulldozers, etc.) will be used for actions covered by this CX. The one exception to this is described above in A.(15) - Patrol, transport, and other work using tracked vehicles over the snow that does not disturb underlying soil.

Known cultural resource sites shall be avoided. Work crews will utilize existing GIS data and or patrol maps to identify and avoid environmentally sensitive areas. If this cannot be done utilizing existing GIS data and or patrol maps, the Project Manager will request an environmental monitor.

If any cultural resources are inadvertently discovered during work covered under this CX, work within 100 feet of the discovery area shall halt immediately, WAPA's archaeologist shall be contacted, and the resource shall be evaluated by an archaeologist or historian who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61). Work in the area of discovery shall not resume until notification to proceed is provided by WAPA's archaeologist.

All work shall be conducted using existing access roads. No wetlands, riparian areas, springs, brooks, rivers, creeks, and/or streams, shall be disturbed.

WAPA has a clean vehicle policy intended to prevent the transport of non-native and invasive plants and animals, including noxious weeds and aquatic nuisance species. Operators will be required to thoroughly wash all vehicles and equipment (trailers, trucks, UTVs, etc.) before entering the action area and working on the project.

WAPA will exercise care to preserve the natural landscape and shall conduct operations to prevent any unnecessary destruction, scarring, or defacing of the natural surroundings in the project vicinity.

To minimize impacts to the environment and prevent damage to access roads, operation of off-road equipment will not be permitted during periods of heavy rains, when soils are wet, or when excessive soil damage may occur due to unsuitable operating conditions. No maintenance activities shall be performed during periods when the soil is too wet to adequately support equipment. If equipment creates ruts in excess of 6 inches deep, the soil shall be deemed too wet to adequately support the equipment.

WAPA will design and construct the transmission line components in conformance with the most current editions of *Suggested Practices for Avian Protection on Power Lines* and *Reducing Avian Collisions with Power Lines*, both published by the Avian Power Line Interaction Committee (APLIC), to minimize avian electrocution risk while maintaining safe and reliable electrical service.

Rocky Mountain Region, Western Area Power Administration

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

E. <u>Determination</u>: Based on my review of information provided to me and in my possession concerning the proposed action, I have determined that the proposed action fits within the specified class of actions, the other regulatory requirements set forth above are met, and the proposed action is categorically excluded from requirements for an EA or an EIS.

Signatúre

Date: / All 2016

Brian Little

NEPA Compliance Officer

Rocky Mountain Region

Western Area Power Administration

Rocky Mountain Region, Western Area Power Administration

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

ATTACHMENT A

Conditions That Are Integral Elements of the Classes of Actions in Appendix B That Apply to This Proposal

Checklist for Categorical Exclusion Determination, revised Nov. 2011

Application of Categorical Exclusions (1021.410)	Disagree	Agree	Unknown
(b)(1) The proposal fits within a class of actions that is listed in appendix B to subpart D.		X	
(b)(2) There are no extraordinary circumstances related to the		X	
proposal that may affect the significance of the environmental			
effects of the proposal, including, but not limited to, scientific			
controversy about the environmental effects of the proposal;			
uncertain effects or effects involving unique or unknown risks;			
and unresolved conflicts concerning alternate uses of available		:	
resources.		37	
(b)(3) The proposal has not been segmented to meet the		X	
definition of a categorical exclusion. Segmentation can occur when a proposal is broken down into small parts in order to			
avoid the appearance of significance of the total action. The			
scope of a proposal must include the consideration of			
connected and cumulative actions, that is, the proposal is not			
connected to other actions with potentially significant impacts			:
(40 CFR 1508.25(a)(1)), is not related to other actions with			
individually insignificant but cumulatively significant impacts		ì	
(40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR			
1506.1 or § 1021.211 of this part concerning limitations on			
actions during EIS preparation.			
B. Conditions that are Integral Elements of the Classes of	NO	YES	Unknown
Actions in Appendix B.			
(1) Threaten a violation of applicable statutory, regulatory, or	Χ.		
permit requirements for environment, safety and health, or]	
similar requirements of DOE or Executive Orders.			
(2) Require siting and construction or major expansion of	X		
waste storage, disposal, recovery, or treatment facilities		1	
(including incinerators), but the proposal may include		İ	
categorically excluded waste storage, disposal, recovery, or treatment actions or facilities.			
(3) Disturb hazardous substances, pollutants, contaminants, or	X		
CERCLA-excluded petroleum and natural gas products	Λ		
that preexist in the environment such that there would be			
uncontrolled or unpermitted releases.		•	
(4) Have the potential to cause significant impacts on	X		
environmentally sensitive resources. An environmentally		-	
sensitive resource is typically a resource that has been			
identified as needing protection through Executive Order,]	

Rocky Mountain Region, Western Area Power Administration

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

statue, or regulation by Federal, state, or local government,			
or a federally recognized Indian tribe. An action may be			
categorically excluded if, although sensitive resources are			
present, the action would not have the potential to cause			
significant impacts on those resources (such as			
construction of a building with its foundation well above a			
sole-source aquifer or upland surface soil removal on a site		-	
that has wetlands). Environmentally sensitive resources			
include, but are not limited to:			
(i) Property (such as sites, buildings, structures, and	X		
objects) of historic, archaeological, or architectural			
significance designated by a Federal, state, or local			
government, or property determined to be eligible for			
listing on the National Register of Historic Places;			
(ii) Federally-listed threatened or endangered species or	X		
their habitat (including critical habitat) or Federally-			
proposed or candidate species or their habitat			
(Endangered Species Act); state-listed or state-			
proposed endangered or threatened species or their			
habitat; Federally-protected marine mammals and			-
Essential Fish Habitat (Marine Mammal Protection			
Act; Magnuson-Stevens Fishery Conservation and			
Management Act); and otherwise Federally-protected			
species (such as under the Bald and Golden Eagle			
Protection Act or the Migratory Bird Treaty Act);			
(iii) Floodplains and wetlands (as defined in 10 CFR	X]	
1022.4, —Compliance with Floodplain and Wetland			
Environmental Review Requirements: "Definitions,"			
or its successor);			
(iv) Areas having a special designation such as Federally-	X		
and state-designated wilderness areas, national parks,			
national monuments, national natural landmarks, wild			
and scenic rivers, state and Federal wildlife refuges,			
scenic areas (such as National Scenic and Historic			
Trails or National Scenic Areas), and marine			
sanctuaries;			
(v) Prime or unique farmland, or other farmland of	X		
statewide or local importance, as defined at 7 CFR			
658.2(a), —Farmland Protection Policy Act:			
Definitions, or its successor;			
(vi) Special sources of water (such as sole-source aquifers,	X		
wellhead protection areas, and other water sources that			
are vital in a region); and			
(vii) Tundra, coral reefs, or rain forests; or	X		

Above-Ground Routine Transmission Line Maintenance Arizona, Colorado, Montana, Nebraska, New Mexico, Utah, and Wyoming

(5) Involve genetically engineered organisms, synthetic	X		
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 of the Department of Agriculture, the			
Environmental Protection Agency, and the National			
Institutes of Health.			ļ