



**Department of Energy  
National Nuclear Security Administration  
NEPA Determination Form**



*Categorical Exclusion for Los Alamos County Intertie Electrical Project*

**Proposed Action Title:** Categorical Exclusion for Los Alamos County Intertie Electrical Project

**Program or Field Office:** NA-LA

**Location(s) (City/County/State):** Los Alamos, NM

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**Proposed Action Description**

The Proposed Action includes a proposed powerline extension that would be partially located on U.S. Department of Energy/National Nuclear Security Administration property and partially located on Los Alamos County (LAC) property to provide reliable and redundant power. The powerline would be located within Los Alamos National Laboratory (LANL) Technical Area 71 and the New Mexico Department of Transportation rights-of-way for New Mexico State Road (NM) 4. LANL would perform construction and maintenance of the powerline extension on DOE property and LAC would perform similar work within LAC property respectively. The analysis included herein only applies to DOE property. LAC obtains electric energy and power from DOE under contract. DOE and LAC are each responsible for operation of their respective resources.

NNSA proposes to install 4 primary electrical poles and anchors spanning approximately 0.75 miles along NM 4. Ingress and egress routes to the pole and anchor locations would be along NM 4 with the total disturbance area of approximately 2.3 acres. The line would connect to a H pole on LAC property. Poles would be set to a depth of approximately 10 feet deep.

A vacuum excavator, Digger Derrick and hand tools would be used to install the power poles for the new powerline. Proper disposal of any construction waste; materials management; implementing BMPs; and fulfilling any necessary requirements for reporting to the New Mexico Environment Department (NMED) will be followed.

**NEPA Analysis**

*B4.11: Electric Power Substations and Interconnection Facilities-* Construction or modification of electric power substations or interconnection facilities (including, but not limited to, switching stations and support facilities).

*B4.12: Construction of Powerlines -* Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way.

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**Regulatory Requirements in DOE's NEPA Implementing Procedures**

For the complete DOE National Environmental Policy Act procedures regarding categorical exclusions, including the full text of each categorical exclusion, see DOE's NEPA Implementing Procedures, Appendix B.

**To find that a proposal is categorically excluded, DOE shall determine the following:**

(1) The proposal fits within a class of actions listed in Appendix B to DOE's NEPA Implementing



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Procedures;

(2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal; and

(3) The proposal has not been segmented to meet the definition of a categorical exclusion. The proposal is not connected to other actions with potentially significant impacts, is not related to other actions with individually insignificant but cumulatively significant impacts, and is not precluded by limitations on actions during preparation of an environmental impact statement.

**The classes of actions listed in DOE's NEPA Implementing Procedures, Appendix B, include the following conditions as integral elements of the classes of actions. To fit within the classes of actions in Appendix B, a proposal must be one that would not:** (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) 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; (3) 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; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those identified as needing protection through Executive Order, statute, or regulation by Federal, state, local government, or Federally recognized Indian tribe; (5) 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 of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

**Environmental Impacts and Best Management Practices**

The following table summarizes the potential impacts of the Proposed Action and best management practices (BMPs) to address those impacts.

Resources	Impact Identified	BMP Required
Visual Resources	Temporary visual impacts from generation of dust and particulate matter will occur during construction from vegetation clearing and excavation.  Permanent visual impacts would occur as a new powerline would be placed on the landscape. The powerline would be placed within an already disturbed area along NM 4. Adjacent powerlines exist within the area.	BMPs for minimizing temporary visual impacts, including application of water for dust suppression, will minimize dust in the project area.
Soils	Temporary and minimal impacts to disturbed soils at the project area.	Disturbed soil will remain on site. BMPs for reducing soil erosion (i.e.,



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	Approximately 2.3 acres of disturbance is anticipated for the project for pole and anchor locations, as well as ingress and egress routes.	stormwater pollution prevention plans [SWPPPs] under the required National Pollutant Discharge Elimination System [NPDES] Construction General Permit, sediment fences, and mulching) will be used during construction.
Water Resources	Disturbances could occur within an adjacent floodplain.	BMPs for floodplain protection during construction include use of soft tires on machinery to minimize surface disturbance along ingress and egress routes. BMP's for reducing soil erosion (i.e., sediment fences and mulching) during construction.
Air Quality	Fugitive dust generated by use of heavy machinery during construction activities.	Fugitive dust emissions will be minimized during construction by application of water for dust suppression.
Noise	Noise experienced away from the worksite is anticipated to be below threshold levels that are attributed to hearing loss (70 dB; EPA 1974). <sup>1</sup>	Noise impacts during construction will be mitigated by use of hearing protection for workers.
Ecological Resources	Construction activities that take place during migratory bird nesting season, from May 15 to July 31, are required to coordinate with Triad National Security, LLC (Triad) Biological Resources staff before vegetation removal.	<p>To prevent noxious weeds from establishing, the LANL Invasive Plant Species Management Plan must be followed. BMPs to protect migratory birds (vegetation removal during May 15 to July 31) would be implemented if work takes place within the nesting season.</p> <p>Installations of new power poles with equipment need to be wildlife/avian safe by using standard bird guarding equipment such as covered jumper wires and bushing covers to prevent migratory birds from electrocution.</p>

<sup>1</sup> For every doubling of distance, the sound level reduces by 6 dB (e.g., moving from 10 to 20 meters away from a sound source). The next 6 dB reduction means moving from 20 to 40 meters, then from 40 to 80 meters for a further 6 dB reduction (<https://www.acoustical.co.uk/distance-attenuation/how-sound-reduces-with-distance-from-a-point-source/>).



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		LANL Engineering Standards Manual STD 342-100, Section G4010 "Site Electrical Distribution," Chapter 20 "Wildlife Protection," requires the use of bird guarding equipment when constructing new or modifying existing power lines.
Human Health and Safety	Workers could be exposed to various occupational hazards during construction and operational activities. Such hazards could include the presence of routine hazards associated with construction and operation (e.g., heavy machinery and construction materials) as well as electrical hazards from the powerline.	Occupational risks and hazards during construction and operations activities will be minimized through compliance with safety standards, policies, procedures and controls.
Cultural Resources	One identified archaeological site exists within the work area for the powerline installation alignment along NM 4.	Boundaries of identified cultural resources will be marked with flagging before start of construction. LANL also requires the presence of a monitor during all ground-disturbing activities that are near the site in accordance with the LANL Cultural Resources Management Plan <sup>2</sup> and Programmatic Agreement <sup>3</sup> .
Waste Management	Potential for waste generation during construction activities.	Waste from the project will be managed in compliance with federal and state regulations and DOE requirements.
Trails	The proposed project could temporarily impact two trails within the project alignment. These trails include the Water Canyon Overlook trails and Boundary trail systems within LANL.	Coordination with the Trails Management Program on identification and implementation of appropriate safety measures, trail closures, communications and potential trail detours will occur 5 days prior to the start of the project to avoid potential impacts.

<sup>2</sup> LANL 2017a. "A Plan for the Management of the Cultural Heritage at Los Alamos National Laboratory, New Mexico," LA-UR-15-27624, Los Alamos National Laboratory, Los Alamos New Mexico, March 31, 2017.

<sup>3</sup> DOE 2017a. Programmatic Agreement among the U.S. Department of Energy, National Nuclear Security Administration, Los Alamos Field Office, the New Mexico State Historic Preservation Office and the Advisory Council on Historic Preservation Concerning Management of the Historic Properties at Los Alamos National Laboratory, Los Alamos, New Mexico. August 2, 2017.



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**NEPA Compliance Officer Determination**

Based on my review of information conveyed to me and in my possession concerning the proposed action, as NEPA Compliance Officer (as authorized under NNSA NAP 451.1), I have determined that the proposed action fits within the specified categorical exclusions identified in DOE's NEPA Implementing Procedures, Appendix B, Sections B4.11 and B4.12. If changes are made to the scope of the action so that it is no longer bounded by the above description, or the project is changed to encompass other actions, NEPA requirements for the action will need to be reassessed at that time and further analysis may be required. I have determined that there are no extraordinary circumstances present, and that the proposal has not been segmented. I approve the proposed project under DOE's NEPA Implementing Procedures, Appendix B4.11 and B4.12. This determination is made pursuant to the NEPA [42 U.S.C. 4321 et seq.] and the DOE NEPA Implementing Procedures.

NEPA Compliance Officer

Date