

**Project title: Roseville Elverta (RSC-ELV) OPGW Replacement Project**

**Requested By: David Young**

**Mail  
Code : N1410**

**Phone: 916-353-4542**

**Date Submitted: 5/4/2011**

**Date Required: 5/7/2011**

**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 and Reclamation 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.

There is an existing OPGW communications fiber on the transmission towers between Roseville and Elverta (RSC-ELV). The existing fiber on RSC-ELV segment of the transmission system is at end of life and has resulted in communication system failure and is subject to further reliability issues in the future if not replaced with new fiber. In to maintain reliability in the communications system that supports Western's power system interconnection with Roseville, Western plans to replace the existing fiber on the RSC-ELV line with new fiber on the same transmission towers and no new structures or modifications are needed. The project simply replaces the existing fiber in the same location and same towers as the existing fiber.

The replacement fiber activities are 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 exclusions B4.6 and B4.7 which allows for , but not exclusive to, adding/modifying electrical facilities within a previously developed area and removing old and adding new fiber to an existing line.

Background

The initial environmental coverage for the RSC-ELV transmission line was completed with the Final Environmental Assessment for Right-of-Way Maintenance in the Sacramento Valley, August 2005 (DOE/EA-1395). However, the EA did not cover the adding or removing fiber optic cable; however, the mitigation requirements included in the EA are included and more stringent mitigation in the CX for the proposed project to assure no adverse environmental affects.

All the RSC-ELV OPGW replacement activities will take place between May 1<sup>st</sup> and September 30<sup>th</sup> 2011 therefore, is outside the rainy season which is the most sensitive time a year for Vernal pools and both tadpole and fairy shrimp. A minimum buffer of at least 50-feet will be established and maintained throughout construction activities; whereas, the Final Environmental Assessment for Right-of-Way Maintenance in the Sacramento Valley, August 2005 (DOE/EA-1395) required a minimum of 25-feet.

The southern portion of the RSC-ELV OPGW is adjacent to the Sacramento Area Voltage Support Project (SVS) which is a new double circuit 230 kV line being constructed by Western. The SVS project started construction in April 2010 and is anticipated for completion by September 2011. Given that the geographical area, sensitive

species, topography are physical characteristics are similar to the SVS project, Western will implement the same or exceed the level of Migratory Bird Treaty Act (MBTA) related mitigation used for the SVS line to meet the intent and for full compliance with the MBTA;

There is no slender orcutt grass in the ROW or in the vicinity of the project area; therefore, no impacts would result;

The project is being conducted during the Giant Garter Snake's (GGS) active period between May 1, 2011 to September 30, 2011 and the project area and immediate vicinity is not considered prime GGS habitat. However, there is a rice field between structures 9/2 – 9/5 but no ground activities will take place in this span other than vehicular access within the ROW and no adverse affects would result.

The Swainson's hawk generally uses wide open agricultural fields with sparse tree coverage for nesting and habitat; the nearest stands of trees to the RSC-ELV are between towers 11-3 and 11-4 (residential trees), 9-2 thru 9-5 (residential trees), and between towers 7-2 and 7-3. Western is conducting MBTA surveys in the project area to determine if MBTA species, Swainson's hawk(s) and/or nest(s) are present and if identified Western will notify CDFG and coordinate project conservation, mitigation and other protective and avoidance measures to minimize and/or assure no adverse impacts to this or other MBTA species.

The pulling and tensioning sites and seasonal access routes were predetermined and carefully selected by a Western biologist to minimize or completely avoid sensitive biological resources and species. There are a total of 5 pulling and tensioning locations starting at the Elverta substation to tower 11/5; 11/5 to tower 7/2; 7/2 to tower 5/1; 5/1 to tower 2/1; and 2/1 to the Roseville substation.

There are four identified pulling locations along the line: 11/5, 7/2, 5/1 and 2/1 and one within the Roseville substation and one within the Elverta substation boundaries. This line is co-located with FIYELV and CWRSC on the GIS layers in Placer county. These lines head east-west and t-out just north of the Elverta substation. All of the pulling and tensioning activities will take place underneath the line in the ROW buffer delineated in Western's GIS layers. Pulling and tensioning generally takes place directly underneath the line in the same angle as the overhead line's angle of travel. These distances can stretch out 200 feet either side of the tower but do not exceed more than half the span between towers.

11/5 is located near the intersection of Rio Linda Boulevard and Los Garcias Lane in grassland/grain crop habitat. The aerial photos do not give any indication of swales or vernal pool rings, and the ground has previously been planted as a grain crop. No listed species are anticipated to occur in this ROW pulling location. Access to this pulling site is from Rio Linda on to the ROW road underneath the line.

7/2 is located 3/4 mile north of the intersection of Baseline Road and Watt Avenue. The habitat is pasture and possible vernal pool habitat. Line crews will place plywood underneath all equipment to avoid rutting or impacting the soils if wet conditions still linger at the time of pulling. Since it has been rather rainy I would not want any rutting or soil tearing to occur. A biological monitor will be onsite to survey for vernal pool habitat and keep any equipment the appropriate buffer distance away. Additional details are listed below. Access to this site is from Fiddyment Road on to the access road in Western's ROW. This site is two miles down the access road from the entry to 5/1.

5/1 is located at the corner of Fiddyment Road and Pleasant Grove Boulevard in an urban corridor grassland. It looks like there could be vernal pool habitat in the grasslands near the structure but their hydrology has been interrupted by both roads. Line crews will place plywood underneath all equipment to avoid rutting or impacting the soils just like 7/2. Assess to this pull site is from Fiddyment Road to the Western access road within the ROW. There is an access road that runs between 5/2 and 5/1. The pull site will include a set up at both 5/1 and 5/2. All vernal pool habitat will be fenced with silt fencing as per the minimization measures provided in the email below.

**Comment [mks1]:** Not prime habitat but there is a rice field between structures 9/5-9/2 so no ground activities are to take place in these spans.

**Comment [w2]:** Construction activities begin almost immediately. How do we do this?

**Comment [mks3]:** And then what? This is nesting season for more than just hawks. All birds under the MBTA, even those that nest in residential areas, are covered by law. If the helicopter will fly near these trees there are nests we run the risk of flushing birds. There is no real way to avoid this other than timing it later in the spring. We just need to be aware that this could raise some red flags with the public (bird watchers and home owners) and subsequently the Service. This is not a show stopper or anything just a heads up.

**Comment [mks4]:** This means there is ground disturbance so not all of the work is from a helicopter. Please be very careful not to give the impression that there will be no work on the ground.

2/1 is located just off of Washington Boulevard south of Pleasant Grove Boulevard and adjacent to the golf course. The habitat is classified as woodland, live oak but is part of the golf course and urban riparian corridor. There are concerns here with nesting birds and MBTA, but no elderberry or other listed species. There are nesting surveys planned prior to work and biological monitors onsite to account for any impacts to birds. More information is provided in Cherie's email below. Access to this location is proposed from Diamond Oaks Road to the Western Access Road in ROW

Tension sites on the south side outside of Elverta Substation fence line but still in the substation boundary for ROW as well as outside of Roseville Substation at tower 0/2 (still within the Substation ROW on the GIS).

Western is also planning on submitting a construction report to the Service. This report will include photos and details on each pulling site for before, during, and after construction conditions. This report will be submitted to the Service no later than 10 days after the last day of project work. This report will document all minimization measures employed.

Given the current habitat conditions at each of the proposed pulling and tensioning sites as well as the incorporation of all of the minimization measures listed below, Western has determined that the proposed project may affect but is not likely to adversely affect the vernal pool tadpole shrimp and the vernal pool fairy shrimp. The segment between the Elverta substation and tower 11-5 was surveyed by Western for the SVS project, which is still in construction and no Swainson's hawks or other sensitive bird species or nests are in the area. The second pulling segment is between 11/5 and 7/2. The only trees between towers 11/5 and 7/2 and within 500-feet of the ROW are small residential stands and ornamental trees, which are not typically associated with Swainson's hawk nesting or considered prime suitable habitat. The third pull spans from tower 7/2 to 5/1. There are no trees within 1000-feet of either side of the ROW in this segment and there are no trees within several thousand feet of the ROW for the majority of this pull segment. The fourth pull segment is between towers 5/1 to 2/1. This segment is characterized by medium to high density residential development, educational, commercial, recreational, and industrial land uses. There are various stands of trees along this segment and birds and/or nest may be present, however; due to the high level of development, daily human activities, and commercial and industrial operations, the amount of nesting birds and nests are anticipated to be minimal. The MBTA surveys will identify all birds and nests in this area and Western will prohibit any vegetation removal and will implement additional measures, including but not limited to, activity buffers and exclusionary/high visible fencing, to avoid disturbance of birds/nests. If vegetation or other ground clearing is required, the Western biologist will develop and implement stringent measures and monitoring measures to assure minimal or no impacts to sensitive species or nests in this area should they be present. The fifth and final segment is between tower 2/1 and the Roseville substation. This segment is characterized by high density urbanized development with industrial, interstate, commercial, and residential land uses. Please see attached Maps for tower number and distance confirmations. To assure no adverse affects on Swainson's hawk or other nesting birds or habitat additional mitigation, minimization, and/or avoidance measures will be strictly implemented (see below under mitigation).

### Project Overview

The project involves the replacement of the existing fiber optics on the RSC-ELV system. The RSC-ELV ROW is approximately 250 feet wide at a length of approximately 13 miles. Helicopters will be used to deliver personnel to the towers and to deliver the brackets to each tower for installation. Western typically uses helicopters for fiber projects as it is the most efficient way to retrofit the towers with the new brackets, transport and deliver personnel, tools and equipment and to minimize or avoid ground disturbance all together.

Western's Natural Resources Department, biologist, and line crew and foreman conducted a site visit to select and verify splice points along the line that meet design criteria, consider the contractor's

**Comment [w5]:** Up to what date?

**Comment [w6]:** ? There is no negligible.

**Comment [mks7]:** This tower is located in a woodland-live oak stand along an urban drainage. There may be nesting birds in this location. Nothing to get worked up about but this section does not accurately clarify that work will be taking place on the ground here. No vegetation should be cleared to allow equipment in this area. That should be made clear. IF vegetation has to be cleared then we will need to include language covering who will determine what gets cut and how.

capabilities, and most importantly avoid the environmentally sensitive areas to assure no adverse affect on any listed federal or state species or sensitive habitat. Additionally, Western has chosen a contractor that uses a helicopter with a 60% reduction in ambient noise levels to reduce and minimize potential disturbance to birds in the area.

**Comment [w8]:** Those site visits could only determine locations of environmentally sensitive areas and cannot apply at this time of construction to MBTA compliance

The following description includes information regarding typical methods and equipment used for this type of work. Splice points are located at the first and last towers in each stringing segment. On the sending end, there would be a truck to hold the OPGW and a separate machine called a tensioner to feed and run the fiber through the new brackets. On the receiving end there would be a machine called a puller. Travelers (a pulley-like device) would be attached to towers by helicopter as needed. A heavy rope called a p-line is then pulled by helicopter through the travelers on the tops of the towers. One end of the p-line would be attached through a connecting device to the reel of OPGW to be installed. The other end of the p-line would be attached to a puller (a winch device). The puller would be operated to pull the p-line, followed by the OPGW, through the travelers at the tops of the structures.

The OPGW is pulled from the reel at the start of the segment toward the winch at the end of the segment. Once the fiber has been pulled, contractor personnel would complete the installation of that segment at each tower. Finally, the ends of two adjacent segments would be spliced. This is accomplished through the use of a special vehicle that is placed at the base of the tower where the splice is to be made.

<i>Typical Equipment</i>	<i>Explanation of Equipment's Purpose</i>
Truck/	Required to transport new OPGW reels and to hold one of them during installation.
2 ½ Ton Truck	Used to move a Wire Puller or a Wire Tensioner into position.
Wire Puller	Used at receiving end of the OPGW segment being installed to pull the fiber.
Wire Tensioner	Used at the sending end of the OPGW segment being installed to provide proper tension during installation.
Splicing Vehicle	The Splicing Vehicle provides a clean environment and the specialized equipment needed to splice Glass Fibers. This work is done at the base of the tower at the splice point location.
Aerial Devices (Bucket Trucks)	The use of bucket trucks is expected to be largely avoided in favor of helicopters. Nevertheless, they are listed in the event they are needed.
Utility Trucks	As needed
Helicopter	Used to deliver personnel, tools and equipment and to minimize or complete avoidance to sensitive environmental resources.

The project has a very short duration of approximately 2 weeks and will start on May 16<sup>th</sup> due to outages during the peak season for energy demand, and end May 29<sup>th</sup>. This time slot was chosen due to the small window in which an outage would be allowed and also directly ties in with the outage for the SVS project. This time slot was also chosen as it would place construction outside the rainy season and provide extra protection for the vernal pool complexes in the ROW and to minimize disturbance, to the greatest amount feasible, for other sensitive resources. Due to the expedited work and project schedule, the impacts, if any, to sensitive species and habitats would be temporary and non-permanent and would not result in adverse affects. Western will implement additional mitigation, discussed below, to assure no adverse affects on any sensitive species or associated habitats.

Minimization Measures –

The project is proposed for the dry season (May 1, 2011 – September 30, 2011). The following is required for work within 25 feet of vernal pool:

- The Final Environmental Assessment for Right-of-Way Maintenance in the Sacramento Valley, August 2005 (DOE/EA-1395) required a minimum buffer of 25-feet around the edges of vernal pool habitat; and
- This buffer will be maintained by placing silt fence around all vernal pools.

**Comment [w9]:** Do we need this if we are in the dry season and staying out of vernal pools?

The established pull and staging locations, approved by Western’s biologist, are well outside of this required buffer so no adverse affect will result from the proposed OPGW activities. No other ground activities will occur within vernal pools.

The overall duration of the project is approximately two weeks long; therefore, no permanent impacts to sensitive biological resources will result. The work and construction activity schedule is established so that the majority of the activities at each pulling and stringing locations are minimized; thus, only temporary non-adverse impacts would result.

**Comment [w10]:** Impacts to what?

For the majority of the project, helicopter related impacts would be very short, temporary and sporadic (between 2 to 5 minutes) and involve only a “passby” duration to pull and string the fiber from tower to tower. To assure no adverse affects in accordance with MBTA a qualified biologist will be on-site during all preparation, construction, post-construction, and clean-up activities. Additionally, Western has selected a contractor who has the capability to utilize a MD 520 Notare helicopter if needed. The MD 520 Notare reduces noise up to 60% when compared with other helicopters. .

Western will conduct preconstruction MBTA surveys along the entire length of ROW and line of site visual surveys to identify nesting locations or active nests; this preconstruction survey will determine if an active nest occurs within 0.5 miles. If breeding hawks are identified within 0.5 of non-urbanized or within 0.25 miles of urbanized land uses then Western COR will notify the CDFG within 24 hours and determine additional avoidance and minimization measures, if necessary or appropriate to assure no adverse affects.

**Comment [w11]:** Don't we have some history with this and can determine what CDFG would require as mitigation to put in this CX in addition to contacting them?

If nesting hawks are identified, additional helicopter related protection measures will be implemented such as minimizing helicopter flight time within 500-foot buffers of active nests to the greatest amount feasible;

Require indirect/bowed flight patterns to increase distance from active nests;

**Comment [w12]:** Need to check this with Brian Adams

Flagging or high visible fencing to alert helicopter pilot/personnel of nesting locations; and

**Comment [w13]:** Can only be done within the ROW and not in the 500 foot buffer.

Require a daily tailgate meeting with construction personnel and the biologist to alert crews of daily birding and nesting activity.

**Comment [w14]:** Biologists will only be

A qualified biologist will be on site during all construction activities to monitor day to day activities at all locations and provide daily feedback on nest, nesting birds, if applicable, and provide immediate guidance and recommendations to COR and construction crews.

**Map(s)**  
See attached Maps

**Figures(s)**

See attached Figures

**Work Order Number - 100180375**

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 type="checkbox"/> Other Determinations:                 | <input checked="" 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.

\_\_\_\_\_  
Cherie Johnston-Waldeal  
Acting Natural Resource Manager

\_\_\_\_\_  
 Date Approved

bcc:	File Code:	Assigned to: David Young	Project #: 100180375	Environmental Specialist- Date: David Young
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Western Area Power Administration Sierra Nevada Region	<b>CATEGORICAL EXCLUSION (CX) DETERMINATION</b>	Project Number 061205
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Integral Elements

**Project Title:**

**Category of Action:**

- **B4.6** - Additions/modifications to electric power transmission facilities within a previously developed area;
- **B4.7** – Adding/burying fiber optic cable

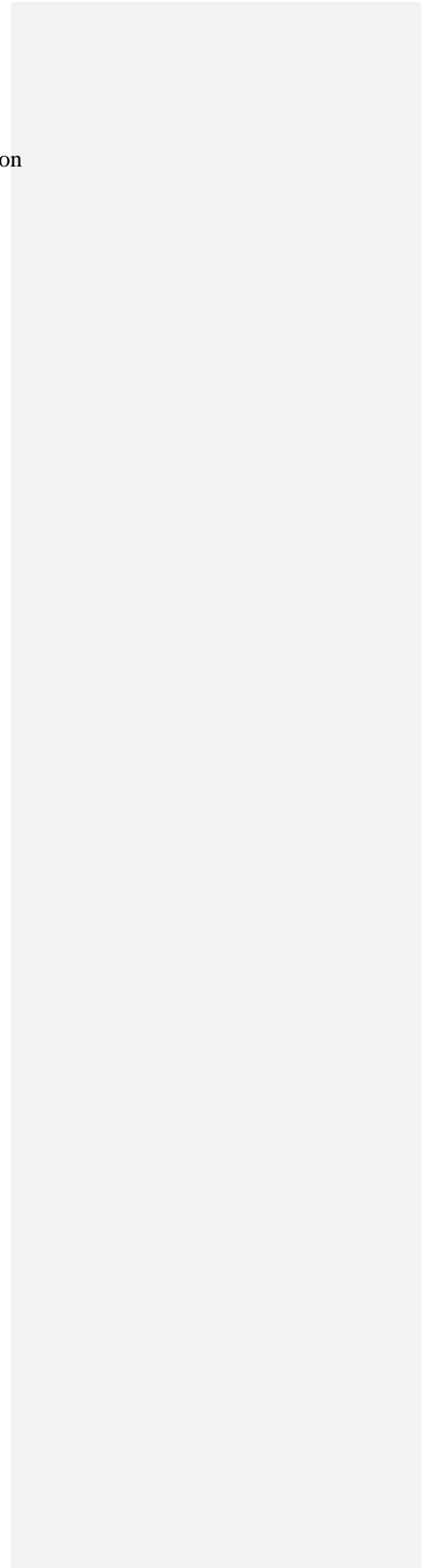
**Regulatory Requirements for a Categorical Exclusion Determination:** The Department of Energy (DOE), National Environmental Policy Act (NEPA) Implementing Procedures, 10 CFR 1021.410(b) require the following determinations be made in order for a proposed action to be categorically excluded (see full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

1. The proposed action fits within a class of action listed in Appendixes 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 preexisting in the environment such that there would be uncontrolled or un-permitted releases; or
  - d. Adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B (4)).
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 is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(I)), is not related to other actions with cumulatively significant impacts (40 CFR 1508.25(a)(2)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

**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 meets the above regulatory criteria and there are no adverse environmental effects associated with this action.







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

Project Number  
061205

**PROJECT TITLE: Roseville-Elverta (RSC-ELV) OPGW Replacement**

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**EFFECTED ENVIRONMENT**

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**REVIEW ACTION**

	SNR Historic Preservation Official has reviewed the proposed project documentation as provided in this CX.
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**CULTURAL AND HISTORIC RESULTS**

	<b>Effects Determination-</b> A determination of “No Adverse Effect” is appropriate for this undertaking. This action meets the stipulations of the Western’s Programmatic Agreement (see box below).
<input type="checkbox"/>	Consultation on this project was completed on N/A_____
<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 at Western Facilities in California,” dated December 11, 1997.
<input type="checkbox"/>	Mitigation required (see below)
<input checked="" type="checkbox"/>	Include in Western’s annual report

**BIOLOGICAL RESULTS**

<input checked="" type="checkbox"/>	Consultation with and comments from the United States Fish and Wildlife Service (USFWS) on the RSC-ELV transmission line was completed with the Final Environmental Assessment for Right-of-Way Maintenance in the Sacramento Valley, August 2005 (DOE/EA-1395). The EA did not cover the adding or removing fiber optic cable; therefore, the mitigation requirements included in the EA and more stringent measures are included in the CX (see below) for the proposed project to assure no adverse affects.
<input type="checkbox"/>	This activity is covered by Western's Biological <b>Opinion</b> , “Formal Programmatic Consultation on the Operation and Maintenance Activities of the Western Area Power Administration,” dated May 27, 1998, U.S. Fish and Wildlife Service File 1.1-97-F-0140.
<input checked="" type="checkbox"/>	Mitigation required (see below)

**Comment [w15]:** Is it?

**COMPLIANCE RESULTS**

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☒	The RSC-ELV OPGW Replacement Project will replace the existing fiber optics with new fiber optic cable; thus, will not use or require the disposal of wood poles or associated hardware.
☐	<p><b>According to Western Construction Standard 7, the following shall apply:</b></p> <p>Oil-borne pentachlorophenol and oil-borne copper Naphthenate will be the only preservatives permitted for wood pole use. The poles shall meet the requirements of the American Wood Preservers' Association (AWPA) P8. The Oil solvent used shall be Type A and meet the requirements of the AWPA P9.</p>
☐	<p><b>Wood Pole Disposal:</b></p> <p>All wood poles and crossarms shall be removed from the right-of-way.</p> <p>Wood Poles will be disposed of in accordance to the attached wood pole disposal guidance provided by SNR. Treated wood poles and members removed during the project shall be recycled or transferred to the public for accepted uses as indicated in the attached guidance.</p> <p>Treated wood poles and members transferred to a landfill or the public shall be accompanied by a written consumer information sheet on treated wood (attached). Obtain a receipt form, part of the consumer information sheet, from the recipient indicating that they have received, read, and understand the consumer information sheet.</p> <p>Treated wood products transferred to right-of-way landowners shall be moved off the right-of-way. Treated wood product scrap or poles and members that cannot be donated or reused shall be properly disposed in a landfill that accepts treated wood and has signed Western's consumer information sheet receipt. Submit treated wood pole consumer receipt forms to the Natural Resources Department after completion of work.</p>
☐	<p><b>Hardware Disposal:</b></p> <p>All wood poles hardware shall be removed from the right-of-way.</p> <p>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>
☒	<p><b>Waste Material Quantity Report:</b> 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**



Other Mitigation: Required

**Comment [mks16]:** Once track changes have been approved please cut and paste the language from the section above here.

Western Area Power Administration Sierra Nevada Region	Environmental Requirements for the Project as Stated Above	Project Number 061205
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This document outlines the environmental restrictions from the Formal Programmatic Consultation on the Operation and Maintenance Activities of the Western Area Power Administration, May 27, 1998, U.S. Fish and Wildlife Service File 1.1-97-F-0140.

**ITEMS CHECKED ARE APPLICABLE TO THIS PROJECT.**

**General**

<input type="checkbox"/>	All routine maintenance activities will be performed during the non-nesting period between July 15 and March 1. The <b>timing</b> of maintenance activities will be adjusted to avoid sensitive periods for special status species and their habitat types. Qualified biologists will <b>monitor or mark</b> sensitive habitat so that it can be avoided by maintenance personnel during specific activities in specific habitat types. Prior to maintenance activities, a qualified biologist will survey the proposed maintenance sites to determine whether nesting raptors are present. If no nesting raptors or northern California spotted owls are present, 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. Refer to the <b>Review Action</b> in this report for further information.
<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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	All work on access and maintenance roads must stay within the existing prism of the roads.

**Comment [mks17]:** This box cannot be checked if we are going to call ground wire replacement routine...

**Comment [mks18]:** Are we excavating anything? Why is this checked? If we are not excavating anything don't check it.

**Comment [mks19]:** These should not actions that are even taking place!!! I would not check these boxes as we do not need to mitigate for non-actions.

**Comment [mks20]:** Same as above

**Elderberry Savanna**

<input type="checkbox"/>	Western maintenance personnel will avoid disturbance within 20 feet of the drip line of each elderberry bush.
<input type="checkbox"/>	No insecticides, herbicides, fertilizers, or other chemicals that might harm the beetle or its host plant would be used within 100 feet of an elderberry plant with a stem measuring one-inch or greater in

**Comment [mks21]:** There is no mention of elderberry habitat in the above section on minimization measures. Are we in know elderberry locations with any of the trucks? From the GIS it looks like there are no know elderberry in any of the pulling locations. Therefore, I would remove this section.

	diameter at ground level.
<input type="checkbox"/>	If avoidance of elderberry bushes is not possible, maintenance will notify Natural Resources prior to initiating work, except in "danger" tree conditions. Special mitigation measures for habitat areas containing elderberry bushes require a survey by a qualified biologist and must be handled by Natural Resources.

**Perennial Streams and Rivers**

<input checked="" type="checkbox"/>	No vehicle refueling within 300 feet of a perennial stream or river channel.
<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.

**Giant Garter Snakes**

<input checked="" type="checkbox"/>	These provisions are applicable in Butte, Colusa, Yuba, Sutter, Yolo, Sacramento, and San Joaquin Counties.
<input checked="" type="checkbox"/>	All work will be conducted between May 1 to October 31, during the snake's active period.
<input checked="" type="checkbox"/>	Vehicle traffic is restricted to designated access roads and the immediate vicinity of construction or maintenance sites. Vehicle speeds will not exceed 15 miles per hour on unimproved access roads.
<input checked="" type="checkbox"/>	If a giant garter snake is observed, all work will stop until it can be determined that the snake will not be harmed.

**Woodland (MBTA habitat)**

<input checked="" type="checkbox"/>	If work must commence during the nesting period (February 1 – August 30) in MBTA habitat, a biological survey or a monitor may be employed to determine the absence or presence of nests and/or MBTA birds. Contact Natural Resources.
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**Grasslands (Kit Fox habitat)**

<input type="checkbox"/>	These provisions are applicable in grassland habitats or disturbed habitats within 0.5 miles of grassland habitats located in San Joaquin, Alameda, and Contra Costa Counties.
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**Vernal Pools**

<input type="checkbox"/>	There are some ephemeral wetlands that should not be traversed by anything other than rubber-tired vehicles, especially when water is present.
<input checked="" type="checkbox"/>	All vehicles are restricted to existing roads in vernal pool habitat.
<input checked="" type="checkbox"/>	Vehicle use off existing roads is restricted to times of the year when soils are dry enough to resist compaction and annual plants have set seed (generally June 1 to September 30). If in question, contact Natural Resources prior to initiating work.
<input checked="" type="checkbox"/>	No vehicle traffic is permitted off established roads within a minimum of 25 feet of individual vernal pools (measured from the upland margin of the pool).
<input checked="" type="checkbox"/>	Materials used for maintenance activities will be located outside of vernal pool habitat or on existing roads.

**Comment [mks22]:** 25 feet listed above... I would change this to 25 feet to maintain consistency.

**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 type="checkbox"/>	Hazardous Materials/Waste on-site to consider

<input type="checkbox"/>	Hazardous Materials/Waste need to be removed off site for disposal/recycling
<input type="checkbox"/>	Piping and oil sampling required
<input type="checkbox"/>	Material Analytical Data: See attached results for reference
<input type="checkbox"/>	Erosion control measures to be taken to prevent sediment from reaching river
<input type="checkbox"/>	Soil Sampling