

**Supplement Analysis
Los Banos-Gates (Path 15) Transmission Line Project
DOE/EIS-0128-SA02**

Western Area Power Administration
Sierra Nevada Customer Service Region
U.S. Department of Energy

Changes to Alignment, Access Road Stream Crossing, and Basis for Supplemental Environmental Impact Statement Determination

Background

The Los Banos-Gates 500-kilovolt Transmission Line project was originally proposed as part of the California-Oregon Transmission Project in the 1980s. These two projects were the subject of a single set of documents prepared in 1986 (draft) and 1988 (final) that served as the Environmental Impact Statement (EIS) under the National Environmental Policy Act and the Environmental Impact Report (EIR) under the California Environmental Quality Act. The EIS is entitled “*Final Environmental Impact Statement for the California–Oregon Transmission Project (DOE/EIS-0128)*.” For a number of reasons, the Los Banos-Gates project was not constructed at that time.

In May 2001, Secretary of Energy Spencer Abraham directed the Western Area Power Administration (Western) to take steps toward developing the Los Banos-Gates Transmission project, also known as the Path 15 project. This directive was issued to carry out a recommendation in the May 2001 National Energy Policy. The Path 15 project is the same as the preferred alternative described and analyzed in the 1986 and 1988 EIS for the original Los Banos-Gates project.

Since the information in the 1988 Final EIS was dated, Western elected to prepare a Supplement Analysis (SA) to determine whether a supplemental EIS would be required for the project. The purpose of the SA was to determine if the revived Path 15 project presented substantial changes to the proposed action relevant to environmental concerns or if there were significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts (10 Code of Federal Regulations [CFR] 1021.314 (c) and 40 CFR 1502.9 (c) (1)). The SA was prepared by reviewing the 1988 Final EIS environmental analysis and supporting documents and the most current information available on the project. Western also held public workshops in Los Banos and Coalinga to gather public comments in support of the SA, which was issued in August 2001. The SA did not identify any substantial changes to the significant environmental impacts identified in the 1988 Final EIS or any new significant impacts. Based on the findings of the SA, Western determined that a supplemental EIS was not required and issued a Record of Decision to that effect on December 20, 2001 (66 FR 65699).

In a separate process, the Pacific Gas & Electric Company (PG&E) was directed by the California Public Utilities Commission (CPUC) to construct the project. The CPUC

reviewed the original EIS, collected current information, and prepared its own revised EIR, the final being issued in October 2001 and titled “*Los Banos-Gates 500-kV Transmission Project: Draft and Final Supplemental Environmental Impact Report (SCH #850-40914)*.” PG&E progressed to the point of defining a preliminary centerline for the Path 15 project within the original 1986 corridor and had begun identifying access routes to the preliminary structure locations.

Issue

As part of the Federal Path 15 project, Western sought non-Federal entities who desired to participate in the project. PG&E was among those selected to participate in the Federal project. As part of a letter agreement executed by the project participants, PG&E agreed to transfer certain information, including environmental, survey, and engineering data. Using this preliminary information, Western began developing plan and profile drawings and refining the route alignment and structure locations. This process resulted in the relocation of certain structures and centerline sections, based on engineering criteria and environmental concerns. In a few areas, these relocations involved relocating structures outside of the 2,000-foot wide corridor originally investigated in the 1986/1988 EIS.

Another result of refining the route alignment and structure locations was the identification of access roads to the final structure sites. One access road would cross Salt Creek approximately 2.5 miles south of the Los Banos Reservoir. A rock low water crossing is proposed for this semi-permanent creek, which still contained standing water in September 2002 despite the drought.

This document examines the portions of the final alignment that are outside the original study corridor and addresses related regulatory and environmental concerns.

Description

Of the approximately 84 miles of transmission line route between Los Banos and Gates substations, a total of about 20 miles were realigned from the PG&E identified preliminary centerline. There were a number of reasons for these realignments, including the use of different structure designs, accessibility to structure sites, avoidance of agricultural conflicts, adjustment of span lengths, reduction of environmental impacts, and generally refining the plan and profile of the transmission line. Such changes were anticipated as part of finalizing the project.

Of the approximately 20 miles of realignments, a little over 5 miles are presently located outside of the original PG&E study corridor analyzed in the original EIS. About 1.9 miles between Western structure numbers 37/1 and 38/5 were rerouted to the east to avoid extremely hilly and broken land. The new alignment closely parallels the corridor boundary, and is no more than 500 feet outside the boundary, with most closer than 500 feet. The new location remains west of the intensive agriculture on the valley floor. Further to the south, one structure, 45/5, is located just barely outside of the corridor

boundary to the east to avoid extremely hilly land. Finally, in the Monocline Ridge area about 3.2 miles of the transmission line has been relocated parallel to, but outside of, the original corridor. This region is extremely rugged and difficult to access, and the new alignment is a maximum of approximately 1,300 feet east of the corridor boundary. It, too, remains west of the agricultural areas on the valley floor.

Salt Creek is a semi-permanent creek located about 2.5 miles south of Los Banos reservoir and 9 miles south of Los Banos Substation. A field reconnaissance of the site was undertaken in February 2003 after significant rainfall in the area. The creek was characterized by a series of shallow pools with a small amount of flow (<1 cubic feet per second) connecting the pools. Because of heavy livestock use, no riparian vegetation was present, and the creek banks and bed were mainly devoid of vegetation, except for an occasional patch of upland vegetation. Only traces of aquatic vegetation were present in the pools, which also exhibited heavy livestock use. The creek is in a flat valley with gently sloping banks, so a conventional culvert crossing would require an earthen berm that would block any large flows that might occur. A breached berm, which is part of a landowner's access road, having a single large diameter culvert was observed across the creek several hundred feet upstream of the planned crossing.

The new Western access road crossing would be in the immediate vicinity of the right-of-way and would consist of a coarse rock foundation in the bed of the creek topped with smaller rock. The top of the rock crossing would be no more than 6 inches above the creek bed when installed and would be even with the creek bed once flows deposit sediment between the rocks. During the periodic high flows, the creek would flow freely over the top of the rock crossing and would not be restricted as it would with a conventional berm and culvert crossing.

Discussion

The centerline segments that are now outside the corridor boundaries are in the same homogeneous areas of undeveloped grazing land as the previous route. Cultural resources and paleontology surveys have yet to be completed for the project, so the realignments pose no constraint to data collection on these resources. Biological data on listed species have been collected within the corridor for the EIS and at preliminary structure locations to augment the original surveys. The new alignments would be surveyed in the spring of 2003, at the same time access roads and final Western structure locations are surveyed. Surveys for San Joaquin kit fox dens and natal dens would also be accomplished based on the new alignments.

The types of construction impacts analyzed in the EIS and SA would not change as a result of the realignments outside of the original corridor but the level of potential impact would. As all access to the project area would be from the valley to the east, less access road construction would be required to access the relocated structures. Fewer miles of access roads would reduce grading and related potential erosion and, thus, reduce impacts from subsequent sediment deposition and surface water quality degradation. This is especially true since the original structure locations are in much steeper terrain, which

would require the construction of longer access roads, including switchbacks, on much more difficult ground. The reduction in access road lengths would reduce or eliminate the steepest portions of the roads, reduce construction difficulty, and reduce the generation of airborne dust during construction and maintenance.

Reduction in access road lengths may also reduce unauthorized use of access roads by four-wheeler and dirt bike riders. Locked gates would be installed in all existing fences to minimize unauthorized access.

Fewer miles of access roads would also reduce the potential to impact Federal and State sensitive plant species and their habitats, and cultural resources or paleontological sites, just through reduction of the overall level of ground disturbance necessary to construct, operate, and maintain the new transmission line. Once the final sensitive species surveys are completed for the transmission line and access road easements, final adjustments in structure and road locations may be required to avoid impacts to specific sites.

The Salt Creek access road crossing was investigated by Western and U.S. Fish and Wildlife Service environmental staff and determined to be a non-sensitive area due to previous and ongoing chronic disturbance by livestock. Observance of a washed-out culvert upstream supports the position that a low water rock crossing is the best design for the occasional high flows in the creek. This type of crossing will ensure that no impoundment of water will occur during high flows, and little maintenance will be needed to keep the access road crossing in service. Western has applied for a Section 401 Water Quality Certification with the Central Valley Regional Water Quality Control Board for this and other drainage crossings. Western has also applied for a Section 404 Clean Water Act permit with the Sacramento Office of the U.S. Army Corps of Engineers.

Findings

The realignments outside of the original study corridor are in the same type of terrain and remain in undeveloped grazing land. The relocations do not affect the type of potential impacts that could occur but do reduce the level of anticipated environmental impact by reducing the number and length of access roads, and reducing the need to construct access roads in extremely steep and less stable areas. The relocations do not affect sensitive species, cultural resources, and paleontology surveys since they have yet to be conducted. The Salt Creek access road crossing will not impact sensitive habitat and will not be a barrier to periodic high flows. On the whole, the relocations reduce the total level of impact the Path 15 project will have on the environment.

This SA will become part of the administrative record of the Path 15 project and will be made public through an announcement in the next project newsletter.