

# CATEGORICAL EXCLUSION DETERMINATION



Western Area  
Power Administration  
Rocky Mountain Region

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**Proposed Action Title: Montrose-Hesperus 345-kV and Curecanti-Lost Canyon 230-kV Transmission Lines:  
Access Road and Transmission Line Right-of-Way Maintenance**

**Location: Dolores, Montezuma, and La Plata Counties, Colorado**

**Project Number: 2021-003**

**Expiration Date: December 31, 2028**

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## **A. 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 between Structures 194 and 412 on the Montrose-Hesperus (MTR-HS) 345-kV Transmission Line in Dolores, Montezuma, and La Plata counties, Colorado, and between parallel Structures 59/5 to 78/4 on the Curecanti-Lost Canyon (CCI-LCN) 230-kV Transmission Line in Dolores and Montezuma counties, 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 project may include motor graders, bulldozers, excavators, dump trucks, compactors, skid-steers, and work trucks. Work will occur on private lands, public lands managed by the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), and trust lands managed by the State of Colorado. This 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.

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## **B. STIPULATIONS PERTAINING TO PROPOSAL:**

- 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, 2028.** 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) The approved works areas for this project include access roads to a width of 30 feet (15 feet either side of road centerline), CCI-LCN ROW areas to a width of 125 feet (62.5 feet either side of center conductor), and MTR-HS ROW areas to a width of 175 feet (87.5 feet either side of center conductor).

- 4) **The Environmental Restrictions Area (ERA) maps provided to WAPA's maintenance crews include a biological resource boundary.** Work within this boundary must be avoided between May 15 and August 15 to prevent disturbance to potential nesting habitat for the Southwestern willow flycatcher. No restrictions exist for work between August 16 and May 14.
- 5) **The Environmental Restrictions Area (ERA) 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) 302-4753. No ground disturbance within these cultural resource boundaries is authorized until written notification to proceed is provided by an RMR Archeologist.
- 6) RMR's Environment Department must be contacted immediately if a dead or injured Canada lynx is encountered on WAPA's right-of-way.
- 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) 593-8803 or (970) 342-6462. 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) 302-4753, (970) 286-3523, or (970) 658-6794. 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) 302-4753, (970) 286-3523, or (970) 658-6794 (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) Per the *Operations Plan for Western Area Power Administration Rocky Mountain Region Electrical Facilities Located on National Forest System-managed Lands*, the following design features (DFs) and standard maintenance practices (SMPs) will be implemented when working on lands managed by the USFS:

WAPA Design Features (DFs)	
DF Number	Description
1	WAPA shall use practical methods and devices that are reasonably available to minimize emissions of air contaminants. This includes particulates from soil disturbance, excessive exhaust from internal combustion engines, etc.
2	Equipment and vehicles that show excessive emissions of exhaust gases due to poor engine adjustments, or other inefficient operating conditions, shall not be operated until corrective repairs or adjustments are made.
3	Use reasonably available methods to prevent or control emissions of dust and fumes to the air. Dust shall be controlled in areas where nuisance dust could disturb nearby residences, public activities, or other sensitive resources, or where local or state air quality regulations require it. Vehicles and other equipment with internal-combustion engines must be maintained and tuned to limit emissions of fumes and particulates.
4	Activities shall be conducted to minimize scarring or defacing of the natural surroundings in the vicinity of the work.
5	Operate heavy equipment only when soil moisture is below the plastic limit or protected by at least 1 foot of packed snow or 2 inches of frozen soil. Soil moisture exceeds the plastic limit if the soil can be rolled into a 3-millimeter (0.12-inch) thread without breaking or crumbling.
6	Organic ground cover shall be maintained so that pedestals, rills, and surface runoff are not increased. Maintain a ground cover of 70 percent or more in the activity areas.
8	If landings, roads, or skid trails are constructed by removing topsoil:
	a) Topsoil will be stockpiled for respreading.
	b) Inclusion of stumps and woody debris with topsoil will be minimized.
	c) Handling topsoil during wet conditions will be avoided.
	d) Topsoil piles will be protected from traffic and water erosion, and will not be buried by slash.
9	All scarification and other site preparation work should be laid out with the terrain contour.
10	Restrict roads, landings, skid trails, concentrated-use sites and similar soil disturbances to permitted areas.
12	Water turnoff bars or small terraces shall be constructed across ROW trails on hillsides to prevent water erosion and to help establish natural revegetation on the trails.
13	When work is finished, all work areas except access trails shall be left in a condition that will help with natural revegetation (unless reseeding, mulching, or other specific requirements apply), provide for proper drainage, and prevent erosion. Seed mix will be approved by the Forest Service. All seed, mulch, and hay approved for use will be properly certified as weed-free.
14	Equipment staging areas and refueling locations will be at least 250 feet away from streams and wetlands. Spill prevention and containment measures will be used at all staging areas and refueling locations.
50	Slash and debris will be kept out of road ditches and drainage channels.
51	Hauling that results in excessive road damage and could contribute to possible sediment discharges into stream channels will be suspended on native surface roads during periods of precipitation. Hauling will be suspended until the road subgrade can adequately carry trucks and there would be no road damage.
52	On haul roads, ruts, holes, and washboards shall be removed by scarifying or cutting the bottom of the defects. Such cut material shall be regraded and compacted at suitable moisture content over the traveled way. Fines accumulated while blading roads or from drainage ditches shall not be wasted over fill shoulders.
53	Water bars, out sloping the prism, and cross drains will be installed as needed to remove surface water and stabilize road surfaces. Stumps, rocks, slash, and logs will be placed on the ripped road surface to a density and depth to mimic the surrounding ground. Specific rehabilitative methods would be determined case by case.
54	Gates or other closures will be installed as needed to prevent unauthorized use of access roads that are not open to public travel, and closure signs will be posted.
56	Reclaim abandoned access routes in transmission-line ROWs.
63	Use of noise-generating equipment next to campgrounds would be limited to daytime hours.



WAPA Standard Maintenance Procedures (SMPs)	
SMP Number	Description
A-1	Do not use equipment that has excessive exhaust emissions because they are in need of repair.
S-1	Minimize maintenance in wet periods and on wet soils to prevent excessive rutting, erosion, and compaction.
S-2	Limit disturbance and removal of soils and vegetation during maintenance activities. These actions shall comply with applicable Clean Water Act requirements.
S-3	Construct water turnoff bars or small terraces across ROW trails on hillsides to prevent water erosion and to help establish natural revegetation.
W-1	Water drainages will not be redirected so that the water would follow a shorter course to natural drainages. Rainwater or groundwater that collects in an excavation (i.e., a hole dug to replace a damaged structure) will not be drained into surface water (i.e., a wetland, stream) without the appropriate permit.
W-2	All spills will be cleaned up immediately. There will be no refueling, chemical storage, or chemical mixing near (e.g., less than 250 feet) surface water.
W-3	Do not stockpile or deposit job materials (e.g., gasoline, chainsaws, and garbage containers) near stream banks, wetlands, lake shorelines, or other surface water. Ensure that project materials are staged away from potential high water areas or storm runoff drainages. These actions shall comply with applicable Clean Water Act requirements.
B-1	Culverts needed at waterway crossings will be installed during periods of low flow and will not create a barrier to fish.
B-2	Excavations over 3 feet deep would be fenced, covered, or filled at the end of each working day, or have escape ramps to prevent entrapping wildlife. Trenches and holes will be inspected before filling to ensure wildlife is not entrapped. If discovered, wildlife will be allowed to escape on their own accord.
B-4	Report mortalities or injuries of any protected wildlife species that occurs as a result of maintenance activities to WAPA or Forest Service biologist.
C-3	Before beginning project activities, project personnel will be instructed on the protection of cultural and environmental resources. The information will address (a) federal and state laws regarding antiquities and plants and wildlife, including disturbance, collection, and removal, (b) the importance of these resources and the purpose and need to protect them, and (c) avoidance areas and special precautions.
G-1	Limit the movement of crews and equipment to ROWs, including access routes, when practical.
G-2	When weather and ground conditions permit, obliterate project-caused deep ruts on or off roads. As needed loosen compacted soils by scarifying, harrowing, disking, or other approved methods. Repair damage to ditches, drainages, and access. Restore land and facilities as nearly as practical to the original grade condition.
G-3	Repair fences and gates that may be damaged during maintenance activities. Restore to pre-construction condition.
G-10	When work is finished, ensure that work areas except access trails are left in a condition that will help with natural revegetation (unless reseeding, mulching, or other specific requirements apply), provide for proper drainage, and prevent erosion. Seeding and mulch requirements will be specified. Seed mix will be approved by the Forest Service. All seed, mulch, and hay approved for use will be properly certified as weed-free.
P-3	Ensure that vehicles equipped with catalytic converters are not parked where vegetation could catch on fire.

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**C. NUMBER AND TITLE OF THE CATEGORICAL EXCLUSION BEING APPLIED:**

(See text in 10 CFR 1021, Subpart D.)

B1.3 Routine maintenance

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**D. REGULATORY REQUIREMENTS 10 CFR 1021.410 (b):** (See full text in regulation)

The proposed action fits within a class of actions that is listed in Appendix A or B of 10 CFR 1021.

To fit within the classes of actions listed 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 the Department of Energy (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 Comprehensive Environmental Response, Compensation, and Liability Act (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 listed in paragraph B(4) of 10 CFR 1021, Subpart D, Appendix B; (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.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

The proposal has not been improperly segmented, and 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.

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## E. DETERMINATION:

Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

James  
Wood

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James Wood  
Date: 2023.01.04  
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Signature and Date

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

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