

Project title: **Trinity Off-ROW Tree Removal 2019/2020**

Requested By: Kristen Dalldorf

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Date Submitted: 12-10-2019

Date Required: 12-13-2019

Description of the Project

The Western Area Power Administration (WAPA), Sierra Nevada Region (SNR), is proposing to remove up to 421 hazard trees within and adjacent to the right-of-way along three transmission lines in Trinity County. The three transmission lines are Trinity-Weaverville 60-kilovolt (kV) (TNI-WEA), Lewiston Tap 60-kV (LWN-LWNT), and Trinity Carr 230-kV (TNY-CAR). Hazard trees are trees that have the potential to fall on, grow into, or otherwise compromise the integrity of the transmission lines. Western Order 450.3A dictates the removal of hazard trees in compliance with the North American Electric Reliability Council (NERC) Standard FAC-003-1. Western has limited discretion on the removal of trees that meet hazard standards.

The transmission lines were evaluated by a contracted forester who identified 421 trees as hazard trees. To ensure continued reliability of the power system, the 421 hazard trees have been proposed for removal. Fifty-nine trees are within the right-of-way and 362 trees are outside the right-of-way. Trees outside of right-of-way are located between 1 and 101 feet from the right-of-way. Trees evaluated for removal were 89% douglas fir, 6% pine (ponderosa, sugar or grey), and 5% oak (black, white, or live). Fifty-five percent of trees were dead or dying with the remaining trees visibly impacted by bugs, drought, age, rot, fungus, or their position on the landscape (resulting in leaning).

Trees are expected to be removed in late 2019 and early 2020, weather permitting. Any remaining trees and trees in northern spotted owl critical habitat will be removed after July 31, 2020 to avoid northern spotted owl breeding and nesting season.

☐ **Map(s)**

See attached Maps

☐ **Figures(s)**

See attached Figures

☒ **Work Order Number** – 100153025

Action taken

Note: All Documentation is Attached

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| ☒ Categorical Exclusion (CX) | ☒ Integral Elements |
| ☐ Environmental Assessment (EA) | ☒ NEPA Attachment Sheet |
| ☐ Environmental Impact Statement (EIS) | ☐ Environmental Requirements/Mitigation |
| ☐ Other Determinations: | ☒ 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.

Gerald Robbins, Environment Manager

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Date Approved

bcc:	File Code:	Assigned to: Kristen Dalldorf	Project #: 100153025	Environmental Specialist– Date: Kristen Dalldorf 11-20-19
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Western Area Power Administration Sierra Nevada Region	CATEGORICAL EXCLUSION (CX) DETERMINATION	Project Number 100153025
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Integral Elements

Project Title: Trinity Off-ROW Tree Removal 2019/2020

Category of Action:

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, 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.

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 Appendices 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 that preexist in the environment such that there would be uncontrolled or un-permitted releases; or
 - d. 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 Part 1021, Subpart D, Appendix B;
 - e. 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 listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.
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 has not been segmented to meet the definition of a categorical exclusion. The proposal is not connected to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions requiring preparation of an environmental impact statement.

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 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.



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

Project Number
100153025

PROJECT TITLE:

Trinity Off-ROW Tree Removal 2019/2020

AFFECTED ENVIRONMENT

The project occurs in Trinity County over a 24-mile stretch of three transmission lines between the town of Weaverville and Trinity Reservoir and Trinity Reservoir to the Trinity/Shasta County border. The project area elevation ranges from 1,800-feet to 4,250-feet. The vegetation is predominantly mixed conifer.

REVIEW ACTION

A comprehensive list of regionally-occurring special-status species and sensitive natural communities was compiled from the California Natural Diversity Database (CNDDDB 2019) and the USFWS Information for Planning and Conservation (IPaC) tool (ecos.fws.gov/ipac). Species queries were assessed to determine the likelihood of the species occurring within the project area based on habitat requirements and known species distribution information. One federally listed species, the northern spotted owl, met the habitat and distribution parameters and is likely to occur within the project area. Northern spotted owl critical habitat is also located within the project area.

All hazard tree removal is planned to take place outside of the sensitive northern spotted owl breeding and nesting season in accordance with WAPA's programmatic agreements covering within ROW-activities detailed below in the Biological Results section. For the removal of hazard trees outside the ROW, work practices will be consistent with project conservation measures for in-ROW tree removal. Three hundred and twenty-six of the 421 trees (approximately 77%) are located outside of the critical habitat. Given the work will occur outside of the sensitive breeding and nesting season for the northern spotted owl, WAPA has made a "no effect" determination for the species in the non-critical habitat area (326 hazard trees).

Ninety-five of the 421 trees (approximately 23%) occur within northern spotted owl critical habitat. The trees are located in close proximity to the cleared right-of-way and the removals will be spread over an 8.5-mile stretch of transmission line thereby having limited impact to the value of critical habitat for the conservation of the species. WAPA does not anticipate the removal of 95 hazard trees will negatively impact physical or biological features resulting in adverse modification to critical habitat. Therefore, WAPA is preparing a Biological Evaluation and request for concurrence from USFWS for a "not likely to adversely affect" determination for the northern spotted owl critical habitat. WAPA will await USFWS concurrence before any work occurs within the designated critical habitat.

Migratory Bird Treaty Act restrictions must also be adhered to and are detailed below in the Biological Results section.

CULTURAL AND HISTORIC RESULTS

The Trinity-Weaverville and Lewiston Tap transmission line ROWs and access roads were surveyed in 2006 prior to construction of the line. Four historic mining sites extend from and outside of the ROW. These sites are in the vicinity of planned tree removal. An archaeological monitor will be required on site to ensure that trees are felled away from the sites. An intensive pedestrian survey was conducted in 2015 for off ROW trees that were identified at that time. Additional off-ROW hazard trees have been added since the 2015 survey. Hazard trees in close proximity to the ROW will not require survey if the ROW was negative for cultural resources. All others will require survey prior to the tree removals. It is unlikely that additional cultural

features will be located, however, should additional sites be located contractor will be required to fell the trees way from any cultural site and avoid any other type of disturbance. Cultural sites will be flagged/ or monitored during tree removal activities.

The Trinity-Carr transmission line ROW has been surveyed for cultural resources with the exceptions of areas too steep or too heavily vegetated. No off-ROW trees scheduled for removal have been subject to an archaeological survey. Hazard trees in close proximity to the ROW will not require survey if the ROW was negative for cultural resources. All others will require survey prior to the tree removals. It is unlikely that additional cultural features will be located, however, should additional sites be located contractor will be required to fell the trees way from any cultural site and avoid any other type of disturbance. Cultural sites will be flagged/ or monitored during tree removal activities.

This action is covered by WAPA'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 and Other Routine Activities at Western Facilities in California," revised March, 2010. Appendix B I.B. This action will be included in WAPA's annual report.

Mitigation required:

- Archaeological Monitor present in areas of cultural sites.
- Flagging of sites required.
- This action involves the cutting of danger trees. All trees will be cut manually and left in place.

BIOLOGICAL RESULTS

Studies conducted, in order to evaluate potential impacts of the proposed project on special status species and/or their habitats, included background research to determine which special-status species and their habitats may occur within the project area and a review of habitat types in the project area. Avoidance measures for migratory birds and other resources are detailed below.

Contractor shall adhere to the following avoidance and mitigation measures:

MBTA (Migratory Bird Treaty Act): If planned activities occur between January 1 and September 15, nesting bird surveys will be required prior to project activities. If a nest is detected, an appropriate buffer will be marked in which all O&M activities and herbicide applications will be prohibited from January 1 to September 15 or until nestlings have fledged. A standard nest buffer of 50 feet will be used, unless otherwise indicated by the surveying biologist. A standard buffer of 250 feet will be used for raptor nests, unless otherwise indicated by the surveying biologist. Nesting surveys can be conducted up to 3 weeks prior to Project activities. Please notify Western a minimum of 2 weeks in advance to schedule nesting surveys.

Northern spotted owl: From February 1 to July 31, herbicide application (with the exception of direct application), tree removal, and any noisy or disturbing O&M activities (e.g., chain saw, mechanical chipper) will be prohibited. O&M activities that only require the use of hand tools and pickup trucks are allowable within this time frame.

If O&M activities need to be conducted between February 1 and July 31, a Service-approved biologist will conduct protocol nest surveys using methods described in CDFG 1992 (or the most current survey protocol) under guidance of USFWS. If a nest is detected, the USFWS will be contacted for further guidance.

Northern goshawk: From February 15 to August 15 herbicide application (with the exception of direct application), tree removal, and noisy or disturbing O&M activities (e.g., chain saws, mechanical chippers) will be prohibited or a qualified biologist will conduct nest surveys using methods described in USDA 2005. If a nest is detected, a qualified biologist will mark and monitor an appropriate buffer zone around the nest within which all O&M activities and herbicide applications will be prohibited from February 15 to August 15.

Bald Eagle: From February 1 to August 15 herbicide application or noisy or disturbing O&M activities (e.g. power saws, mechanical chippers) will be prohibited anywhere that bald eagles are known to nest or a qualified biologist will conduct nesting surveys using methods described in Jackman and Jenkins 2004. If a nest is detected, all herbicide application and O&M activities will be prohibited at a distance determined by the qualified biologist, based on topography and/or other environmental considerations.

Western pond turtle: From April 15 to July 15, a qualified biologist will survey within 400 feet of a permanent pond, lake, creek, river, or slough if any ground-disturbing activity that could affect the bed, bank, or water quality of any of these features is proposed. If adult or juvenile pond turtles are present, a qualified biologist will monitor project activities to ensure that turtles are not harmed. If the biologist determines that turtle nests could be adversely affected, then nesting areas will be avoided between June 1 and October 31. Water features will be avoided.

Pacific fisher: Between February 1 and August 1, off-road vehicle travel and activity will be avoided to the extent possible. If off-road travel or ground disturbance is required in potential fisher habitat (closed canopy, old-growth forests) at any time of year, disturbance to existing downfall, snags, downed trees/logs, and stumps will be minimized. Existing snags, downfall, and stumps will never be moved or removed unless they are a specific safety concern.

Gray wolf: Between January 1 and August 31, off-road vehicle travel and activity will be avoided to the extent possible. If off-road travel or ground disturbance is required in potential gray wolf habitat, a qualified biologist will conduct a survey to determine if dens are present. If dens are present, then activities will be avoided by a buffer determined by WAPA's biologist.

Oregon snowshoe hare: Off-road travel will be minimized. Vehicle speeds will not exceed 15 mph on access and maintenance roads and 10 mph on unimproved access routes.

Bats: Noisy or disturbing O&M activities (e.g., power saws, mechanical chippers) will be minimized in the vicinity of caves, mine tunnels, and rock outcrops.

Snags and live trees will be left standing to the maximum extent possible.

Plants: Vehicle access will be permitted only on well-established roads during the bloom season until the site has been cleared by a qualified biologist. All vehicles will have rubber tires. Off-road travel will be avoided to the extent possible.

During the blooming season (February – September), activities require a survey by a qualified biologist to flag existing plant populations or clear the site if the site is located in an area where a sensitive plant population has the potential to occur. The table below identifies the plants that must be surveyed for during specific time periods for each applicable tower range. If botanical surveys and/or marking of sensitive plant populations are required, please notify WAPA at least 2 weeks in advance.

Tower Range	Common Name	Scientific Name	Habitat	Bloom Season
TNI-WEA 7/6-10/7	Porcupine sedge	<i>Carex hystericina</i>	Riparian, streambanks, marshes, swamps	May-June

If vegetation-management activities are proposed during the blooming season, a qualified biologist will mark special status plant populations (including a 50-foot buffer zone) prior to O&M activity. Within 100 feet of the marked area, the following work area limits will be provided: 1) only manual clearing of vegetation will be allowed within 50 feet of the edge of the flagged area, and 2) mechanical treatment of all kinds (including mowers, tractors, chippers, dozers) will be prohibited.

Herbicide will be prohibited at all times with the exception of direct application to target vegetation.

Wetlands: Restrictions for seasonal wetlands (including vernal pools and vernal pool grasslands) include: Vehicle access will only be permitted on well-established roads unless soils are dry. Soils will be considered sufficiently dry for vehicle access when they resist compaction, and after annual plants have set seed (generally June 1 to September 30, or as determined by a qualified biologist based on personal observation of the soils).

When feasible, all maintenance activities will be routed around wet areas while ensuring that the route does not cross sensitive resource areas.

If vegetation management activities are proposed within 250 feet of a seasonal wetland a biological monitor will be present and/or a qualified biologist will clearly mark the limits of the feature(s) or appropriate buffers. A qualified biologist will clearly flag a 50 foot buffer around all seasonal wetland features if work is proposed during the wet season (generally October 1 to May 31) or flag the feature if work is proposed during the dry season (generally June 1 to September 30).

Mixing or application of pesticides, herbicides, or other potentially toxic chemicals will be prohibited within 250 feet of seasonal wetland features.

Herbicide application to target vegetation by direct application methods (e.g. injection or cut-stump treatment) will be prohibited within 50 feet of wetland features in the wet season and allowed up to the edge of the wetland feature during the dry season.

Herbicide application by basal spray and foliage spray methods will be prohibited within 100 feet of wetland features in any season.

Manual clearing of vegetation (chainsaw, axe, clippers) will be allowed up to the edge of the pool or seasonal wetland in the wet season; a buffer will not be necessary in the dry season.

Mechanical clearing of vegetation (heavy-duty mowers, crawler tractors, or chippers) will be prohibited within 100 feet in the wet season; a buffer will not be necessary in the dry season.

All equipment will be stored, fueled, and maintained in a vehicle staging area 300 feet or the maximum distance possible from any vernal pool, vernal pool grassland, or seasonal wetland, and no closer than 200 feet unless a bermed (no ground disturbance) and lined refueling area is constructed and hazardous material absorbent pads are available in the event of a spill.

Vehicles will be inspected daily for fluid leaks before leaving the staging area.

Waters (Seep, Spring, Pond, Lake, River, Stream, and Marsh): The following activities will be prohibited at all times within 100 feet of a seep, spring, pond, lake, river, stream, or marsh, and their associated habitats:

- Vehicle access, except on existing access and maintenance roads
- Dumping, stockpiling, or burying of any material

- Mixing of pesticides, herbicides, or other potentially toxic chemicals
- Open petroleum products

Equipment will be stored, fueled, and maintained in a vehicle staging area 300 feet or the maximum distance possible from any seep, spring, pond, lake, river, stream, marsh, or their associated habitats. Vehicles will be inspected daily for fluid leaks before leaving resource area.

For vegetation management or maintenance within 100 feet of any seep, spring, pond, lake, river, stream, or marsh, or any of their associated habitats, the following work-area limits will be provided:

- Only manual-clearing of vegetation will be permitted
- Basal and foliar application of herbicides will be prohibited. Only direct application treatments (e.g. injection and cut-stump) of target vegetation will be allowed using herbicide approved for aquatic use by the U.S. EPA and in coordination with the appropriate federal land manager.

When feasible, all maintenance activities will be routed around wet areas while ensuring that the route does not cross sensitive resource areas.

Threatened and Endangered Species

Federal law prohibits the taking of endangered, threatened, proposed or candidate wildlife and plants, and destruction or adverse modification of designated Critical Habitat. Federal law also prohibits the taking of birds protected by the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act. "Take" means to pursue, hunt, shoot, wound, kill, trap, capture or collect a protected animal or any part thereof, or attempt to do any of those things.

Known Occurrence of Protected Species or Habitat: Following issuance of the notice to proceed, and prior to the start of construction, Western will provide training to all contractor and subcontractor personnel involved in the construction activity. Untrained personnel shall not be allowed in the construction area. Western will provide two sets of drawings showing known sensitive areas located on or immediately adjacent to the transmission line right-of-way and/or facility. These areas shall be considered avoidance areas. Prior to any construction activity, the avoidance areas shall be marked on the ground in a manner approved by the COR. If access is absolutely necessary, the contractor shall first obtain permission from the COR, noting that a Western and/or other government or tribal agency biologist may be required to accompany personnel and equipment. Ground markings shall be maintained through the duration of the contract. Western will remove the markings during or following final inspection of the project.

Unknown Occurrence of Protected Species or Habitat: If evidence of a protected species is found in the project area, the contractor shall immediately notify the COR and provide the location and nature of the findings. The contractor shall stop all activity in the vicinity of the protected species or habitat and not proceed until directed to do so by the COR.

Prior to the start of project activities: all personnel will participate in environmental awareness training which will inform them of the sensitive habitats within the project area, the species that have the potential to occur in the project area, and the avoidance and minimization measures that are to be adhered to during project activities. Any new crew members that start after project activities have started will be given the environmental awareness training prior to starting work on site.

General Mitigation/Avoidance Measures: The Contractor shall follow all species specific conservation measures listed above as applicable to each site, in coordination with Western's Natural Resources Point of Contact (POC) and the COR.

Perennial Streams and Rivers

The following activities will be prohibited at all times within 100 feet of a seep, spring, pond, lake, river, stream, or marsh, and their associated habitats:

- Vehicle access, except on existing access and maintenance roads, unless approved by Natural Resources
- Dumping, stockpiling, or burying of any material, except as required for specific O&M activities (e.g., rip-rap)
- Mixing of pesticides, herbicides, or other potentially toxic chemicals
- Open petroleum products

Equipment will be stored, fueled, and maintained in a vehicle staging area 300 feet or the maximum distance possible from any seep, spring, pond, lake, river, stream, marsh, or their associated habitats. Vehicles will be inspected daily for fluid leaks before leaving the staging area.

All spills of fuel or hydraulic fluid would be immediately cleaned up according to Western's guidelines for hazardous material handling.

COMPLIANCE RESULTS

Pollutant Spill Prevention, Notification, and Cleanup: The Spill Prevention, Notification, and Cleanup Plan is expected to be a brief description of the measures taken by the contractor to prevent spills, to notify in the event of a spill, to train personnel, and to describe the company's commitment of manpower, equipment, and material which would be mobilized in the event of a spill. The plan should describe those elements in proportion to the risks posed by the project. This not intended to be the Spill Prevention, Control and Countermeasures Plan, as specified in 40 CFR 112. Those plans are required by law for facilities with ≥ 1320 gallons of oil storage.

Prevention of Air Pollution: Federal law requires the protection of air quality under the Clean Air Act. All activities on this project shall be compliant with Federal, State, and local regulations. In particular, California Air Resources Board regulations apply to diesel equipment and trucks as well as fleets of large spark ignition equipment.

Conformity Appendix B: Since the cited categorical exclusion is listed in Appendix B to 10 CFR Part 1021, Subpart D a general conformity review is required for this project, pursuant to Clean Air Act General Conformity Requirements and the National Environmental Policy Act Process guidance document published by Department of Energy in April, 2000.

This project is exempt from the requirement to prepare a general conformity determination because it is categorized as B1.3: Routine maintenance. Routine maintenance is exempt from general conformity requirements under the exemption found at 40 CFR 93.153(c)(2)(iv).

Air Quality Standard Operating Procedures: The following standard operating procedures are from part of the North Area Right of Way Environmental Assessment, and are to be used for all WAPA projects in the North zone for SNR:

AQ-SOP-1: WAPA will adhere to all applicable requirements of those agencies having jurisdiction over air quality matters, and any necessary permits for O&M will be obtained.

AQ-SOP-2: Machinery and vehicles will be kept in good operating condition and older equipment will be replaced with equipment meeting applicable emission standards; appropriate emissions-control equipment will be maintained for vehicles and equipment, per California, EPA and WAPA air-emission requirements.

AQ-SOP-3: Idle equipment will be shut down when not in active use.

AQ-SOP-4: Dust –control measures will be implemented as needed. Trucks transporting loose material will be covered or maintain at least two feet of freeboard and will not create any visible dust emissions.

AQ-SOP-5: There will be no open burning of construction trash.

AQ-SOP-6: Grading activities will cease during periods of high winds (as determined by local air quality management districts).

AQ-SOP-7: Major operations will be avoided on days when the local Air Quality Index is expected to exceed 150.

AQ-SOP-8: Dust control measures such as water or chemical suppressants will be used if needed.

AQ-SOP-9: Re-seeding of ground surfaces that have been significantly disturbed to prevent wind dispersion of soil;

AQ-SOP-10: Project will incorporate regular watering of exposed soils and unpaved access roads during ROW maintenance activities.

Prevention of Water Pollution: Federal law requires the protection of water quality under the Clean Air Act. The project is exempt from the General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities issued by the California State Water Board because it consists of routine maintenance activities in an existing right of way, and because the proposed staging areas occurring outside that existing right of way measure collectively less than one acre. Construction activities must therefore remain strictly within the boundaries specified in the plans in order to qualify for this exemption. Best management practices will be used to control runoff from the project areas.

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.

There will be no uncontrolled or un-permitted releases of hazardous substances, pollutants, contaminants, or petroleum and natural gas products to avoid Adversely affecting environmentally sensitive resources.

In the event of a Hazardous Material/Waste spill Natural Resources and the COR 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).

Hazardous Materials/Waste on-site to consider: Fueling of equipment; In the right of way, place spill drip pans (or similar) below fueling areas, spill kit and tools available nearby to stop the flow of fuel spills, and employees trained in spill response.

Hazardous Materials/Waste need to be removed off site for disposal/recycling

GENERAL REQUIREMENTS

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| <ul style="list-style-type: none">• Under the Migratory Bird Treaty Act of 1918, migratory bird species and their nests and eggs are protected from injury or death. Impacts to migratory bird nests shall be avoided during the nesting season (January 1 to September 15). If project activities occur during the nesting season, WAPA will survey the project area for migratory bird nests prior to project activities and establish appropriate buffers around any active nests that may potentially be disturbed. If work must be conducted within these buffers, a WAPA supplied biological monitor will be on site for project activities within the buffers. If the biological monitor determines that activities are likely to cause nest impacts or nest abandonment, then project activities in the area shall be postponed or adjusted until nestlings have fledged, the nest is no longer active, or the activities are not likely to cause nest impacts or nest abandonment. |
| <ul style="list-style-type: none">• Vegetative management plans will be followed as appropriate. |
| <ul style="list-style-type: none">• Habitat diversity will be maintained to the greatest extent feasible. |
| <ul style="list-style-type: none">• Dispose of all cleared vegetation in an appropriate manner subject to landowner requests. |
| <ul style="list-style-type: none">• Natural Resources will be contacted immediately:<ul style="list-style-type: none">o If there is a "take" of a special status species or action affecting their critical habitat, and/oro If archeological, paleontological, or historic evidence is found. |
| <ul style="list-style-type: none">• If used, survey stakes will be removed as a part of the final clean up. |