



NOTICE OF EXEMPTION

To: Office of Planning and Research
 P.O. Box 3044, Room 113
 Sacramento, CA 95812-3044

From: Sacramento Municipal Utility
 6201 S Street, H201
 P.O. Box 15830
 Sacramento, CA 95852-1830

Recorder-Clerk
 County of Sacramento
 P.O. Box 839
 Sacramento, CA 95812

Project Title: 115kV Transmission Line Steel Pole Recoating 49th to 59th Streets Project

Project Applicant: Sacramento Municipal Utility District (SMUD) 6201 S Street, MS H201, Sacramento, CA 95817-1899

Project Location: The proposed location is in the vicinity between 49th and 59th Streets adjacent to the Sacramento Rapid Transit (RT) Gold Line East Sacramento Corridor, Sacramento, CA 95816

Project Description: SMUD proposes surface preparation and coating of four 115 kilo-Volt (kV) transmission line painted steel poles. The heights of two poles are 95 feet, the other two are 105 feet. The poles were originally installed in the late 1970s and the coatings to be removed contains heavy metals. The existing coating of the poles will be removed with full containment systems prior to the recoating work.

The proposed project is not subject to Article 19, Section 15330 for "minor actions to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous materials or substances," because the proposed action is not undertaken to address the potential release of hazardous materials or hazardous substances, but rather to perform a traditional form of maintenance and prevent further corrosion of the existing poles. The effects of surface preparation and coating on the environment have been evaluated indicating the project will comply with environmental and safety regulations to prevent exposure to human health and the environment. No impacts are expected to occur to agricultural resources, geology, land use/planning, mineral resources, population and housing, public services, and recreation because of the implementation of the project.

Analytical testing on similar utility poles indicate trace amounts of heavy metals. All coating once removed will be tested for hazardous waste characterization and managed in accordance local, state, and federal regulations for hazardous waste management. For the initial refinishing of the poles, it will be necessary to remove all coating layers down to exposed steel to eliminate rust and ensure appropriate adhesion and life of the paint re-coating.

The 115kV lines will be de-energized for the recoating work. The pole locations are located directly adjacent to the RT Gold Line East Sacramento corridor. The trains will remain in operation with the use of flaggers who will work cooperatively with the pole maintenance crews. Maintenance will occur between the hours of 7 am and 7 pm, 7 days a week, and will comply with local noise ordinances. The project is located in an area zoned by Sacramento

City as heavy commercial, (City of Sacramento Planning and Development Code September 2014). The four poles are owned by SMUD. All of them are located within the Sac RT right of way between 49th and 59th Streets, Sacramento, CA. The project will occur in September to October 2019 for approximately three weeks.

Cal/OSHA's Lead in Construction Standards (Title 8 CCR 1532.1) sets an action level (AL) of 30ug/m³ and an 8-hour permissible exposure limit (PEL) of 50ug/m³ for this type of activity and requires implementation of protective measures until air monitoring indicates that exposure is at or below the PEL. Protective measures include appropriate respiratory protection (P-100 air purifying half mask), clean work clothes provided at least once a week, change areas with separate storage facilities for work and street clothes, hand washing facilities, biological monitoring (baseline blood sampling), and training. The painting contractors will comply with all environmental regulatory requirements by capturing removed coatings generated and employing Best Management Practices (BMPs) to control releases of coating particulates into the surrounding environment. These measures consist of full containment systems with scaffolds and wrappings, and laying a plastic tarp at the base of each tower to collect coatings particulates and debris. The coating particulates and debris will be collected and consolidated in DOT specification containers and marked and labeled prior to removal for offsite disposal. Additional sheeting will be used where there is the possibility of material entering storm drains or being transmitted onto adjacent properties.

Name of Public Agency Approving the Project: Sacramento Municipal Utility District

Name of Person or Agency Carrying Out the Project: Sacramento Municipal Utility District

Exempt Status (Check One):

- Ministerial (CEQA PRC §21080(b)(1); CEQA Guidelines §15268)
- Declared Emergency (CEQA PRC §21080(b)(3); CEQA Guidelines §15269(a))
- Emergency Project (CEQA PRC §21080(b)(4); CEQA Guidelines §15269(b)(c))
- Categorical Exemption (CEQA PRC §21080(b)(9), 21084; CEQA Guidelines §15301, Existing Facilities (b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.

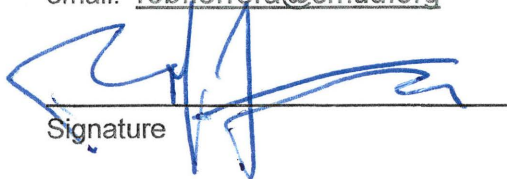
Reasons Why Project is Exempt: Under CEQA Guidelines § 15062, a lead agency must identify the rationale for making the determination that a project is exempt under CEQA. The project qualifies for a categorical exemption listed in Article 19, Section 15301 of the California Environmental Quality Act (CEQA) Guidelines for Class 1, consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use beyond that existing at the time of the lead agency's determination, (b) Existing Facilities of "both investor and publicly-owned utilities used to provide electric power, natural gas, sewage, or other public utility service." The Class 1, (b) applies to this project. The proposed project will provide maintenance for existing steel pole structures that are corroding and will not expand existing use of the existing 115 kV transmission Line.

The Secretary of Resources has identified general categories of projects that do not have a significant effect on the environment, including maintenance projects. Section 15300.2 of the Guidelines, however, lists the following exceptions to categorical exemption status: projects

that will have significant cumulative impacts from successive activity of the same type in the same place over time, projects with significant effects due to unusual circumstances, projects that will cause damage to scenic resources within a state scenic highway, projects located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code, and projects that will cause a substantial adverse change in the significance of a historical resource. The poles were first painted and installed in the late 70's, and the paint to be removed contains lead but is not lead based with a very low percentage, thus it is not categorized as lead based paint. The proposed project is not subject to Article 19, Section 15330 for "minor actions to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous waste or substance," because the proposed action is not undertaken to address the potential release of lead paint, but rather to perform a traditional form of maintenance and prevent further corrosion of the existing poles. The effects of the paint removal and pole repainting on the environment have been evaluated indicating the project will comply with air quality and worker exposure regulations and will have no significant adverse effects on any other resources, as described.

Lead Agency Contact Person:

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Signature

September 25, 2019
Date

Rob Ferrera
Printed Name

Sacramento Municipal Utility District
Lead Agency

- Signed by Lead Agency
- Signed by Lead Applicant

Date Received for filing at OPR: Governor's Office of Planning & Research

SEP 26 2019

STATE CLEARINGHOUSE