

# RECLAMATION

*Managing Water in the West*

## FINDING OF NO SIGNIFICANT IMPACT

# Santa Clara Conduit Maintenance and Repairs

FONSI-10-050

Recommended by:

  
\_\_\_\_\_  
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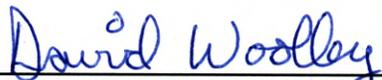
Date: 2/3/2011

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Date: 2/7/2011

Concurred by:

  
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Date: 2-8-2011

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Date: 2/8/2011



## Introduction

In accordance with section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the South-Central California Area Office of the Bureau of Reclamation (Reclamation), has determined that the approval of the Santa Clara Conduit maintenance and repairs project is not a major federal action that will significantly affect the quality of the human environment and an environmental impact statement is not required. This Finding of No Significant Impact (FONSI) is supported by Reclamation's Environmental Assessment (EA) Number EA-10-050, *Santa Clara Conduit Maintenance and Repairs* and is hereby incorporated by reference.

Reclamation posted the draft EA/FONSI for public review and comment on Reclamation's website between January 11, 2011 and January 25, 2011. Reclamation received no comments.

## Background

In 2006, Santa Clara Valley Water District (SCVWD) proposed to adopt and implement a Pipeline Maintenance Program (PMP) which defined activities associated with the maintenance and repair of federal and non-federal water supply conveyance systems throughout their jurisdiction. In compliance with the California Environmental Quality Act, SCVWD prepared the *Santa Clara Valley Water District Pipeline Maintenance Program Environmental Impact Report* (SCH#2005101047) [PMP EIR] to analyze the potential environmental impacts of implementing the PMP. A notice of determination was issued by SCVWD on November 13, 2007.

Reclamation prepared an EA and Biological Assessment for the *Pipeline Maintenance Program for the Pacheco and Santa Clara Conduits and Tunnels, Santa Clara Valley Water District*, Draft EA-06-110 (PMP EA) to address actions of the PMP related to the Pacheco and Santa Clara Conduits which are owned by Reclamation and maintained by SCVWD (Reclamation 2006). The Draft PMP EA was posted for a 30-day public comment period which closed November 9, 2007. No comments were received. Finalization of the PMP EA is pending a Biological Opinion from U.S. Fish and Wildlife Service (Service).

In 2008, Reclamation prepared EA-08-78, *Santa Clara Conduit Shutdown, Inspection, and Repair Santa Clara Valley Water District*, to address maintenance of a portion of the Santa Clara Conduit during 2009 (Reclamation 2008). A detailed description of the Santa Clara Conduit facilities was described in EA-08-78, which is incorporated by reference, and not repeated here. A separate Biological Assessment was submitted to Service for EA-08-78 and a Biological Opinion was received January 28, 2009 (Service 2009).

The Biological Opinion is still pending for the PMP EA and portions of the Santa Clara Conduit still need to be inspected for routine and preventative maintenance. Delay in inspections pending the finalization of the PMP EA could lead to system failure in areas where repairs need to be made. This maintenance is needed to meet the SCVWD's obligations of reliable water service and delivery.

## Proposed Action

SCVWD, on behalf of Reclamation, proposes to drain, inspect, repair, and refill approximately 10.6 miles of the Santa Clara Conduit, a Reclamation-owned facility, in February 2011. Best management practices (BMPs) from the PMP EIR and Draft PMP EA-06-110 are included as part of the Proposed Action (see Appendix A). Mitigation measures are included in EA-10-050 and are part of this FONSI, as detailed below.

### Mitigation Measures

Before the SCVWD begins draining, staff will deploy BMPs, mitigation measures and minimization measures for the discharge of raw water into the creeks. These practices/measures will be in accordance with various documents including, but not limited to, SCVWD's 10-year Program environmental impact report (adopted November 2007), the Service Biological Opinion (file number 81420-2009-F-0245), and NMFS' "not likely to adversely affect" letter (file number 2007/05948) that addresses the SCVWD's 10-year program. The referenced opinion from the Service is not specific to the current Proposed Action, but does address a different portion of the same pipeline and includes some of the same dewatering locations.

Baseline readings will be established for turbidity, temperature, and other water quality parameters. These parameters will be monitored and tracked during the period of the discharge to confirm they are within the targeted range. The frequency of the monitoring will be conducted according to the programmatic environmental impact report. If the parameters are outside of the recommended range, adjustments to the discharge will be made such as implementing more BMPs, decreasing the flow rate, or suspending the discharge. Similar monitoring procedures were used on previous pipeline rehabilitation projects on the San Felipe Division.

The applicant proposes to minimize and offset effects to wildlife including, but not limited to, the California tiger salamander and California red-legged frog by implementing the following conservation measures.

1. Vehicles shall access the work areas via local streets, highways, and the existing access roads, except for vault 16, in which the access route will be clearly demarcated by a Service-approved biologist. The routes will be limited to a width of 15 feet or less. Personnel will be required to adhere to marked paths. No other off-road travel will be allowed. If any burrows potentially occupied by California red-legged frogs or California tiger salamanders cannot be avoided, the Service-approved biologist will excavate the burrow and move any animal outside the work area.
2. Unpaved roadway traffic speed will be limited to 10 miles per hour.
3. An individual trained in monitoring water levels will observe flows in receiving waters. If it appears that discharges are approaching channel capacity, discharge rates will be reduced. If erosion is evident, flow rates will be reduced. If erosion continues to occur, discharges will be terminated until appropriate erosion control measures are installed.

Monitoring will be conducted prior to the start of discharge and regularly during the discharge, frequency dependent on the nature of the discharge and the erosion in the area.

4. Woody material (including live leaning trees, dead trees, tree trunks, large limbs, and stumps) will be retained unless it is threatening a structure or impedes reasonable access, in which case it will be retained on site but moved to a less threatening position.
5. No fueling, repair, cleaning, maintenance, or vehicle washing shall be performed at job sites or within 65 feet of a wetland or riparian area.
6. All chemicals stored in staging areas will be stored in secondary containment with no less than 110% capacity. Proper storage and security will be implemented to ensure that chemicals are not spilled or vandalized during non-working hours.
7. No firearms shall be allowed on-site, except for Federal, State, local law enforcement, or security guards.
8. No pets will be allowed at the Proposed Action site.
9. During pipeline draining, wedge wire screens will be placed over the discharge openings of gravity drain gates and on the suction and discharge piping of any submersible pumps used for pipeline discharge to minimize discharge of non-native species.
10. A survey for California red-legged frog and California tiger salamander will be conducted in the receiving water body by a Service-approved biologist one week prior to water release. If a California red-legged frog or California tiger salamander or their larvae are not found within 500 feet upstream or downstream of the release point, absence will be re-verified within 24 hours of the commencement of release. Release can commence if no adults, eggs, or larvae are found 500 feet upstream or downstream of the release point during the second survey. If adults, eggs, or larvae are found within 100 feet downstream of a release point, the discharge point will not be utilized. If found within 200-500 feet of the release point, velocity reduction, accomplished by either slowing release, decreasing release volume, and/or applying dissipation, will be utilized to minimize affects to California red-legged frogs and California tiger salamander.
11. Access and staging in areas with no pre-established areas will be surveyed to avoid serpentine areas and special status plants. A 100-foot buffer zone will be temporarily marked for avoidance. Upon Proposed Action completion, all temporary markers will be removed and properly disposed of.
12. Forty-eight hours prior to the start of construction activities, the site will be surveyed by a Service-approved biologist for California red-legged frogs, California tiger salamanders, San Joaquin kit fox, and least Bell's vireo. If any life stage of these animals is observed, the Service-approved biologist will immediately be notified and will follow protocol outlined in Measure 14.

13. Prior to the start of construction activities, a Service-approved biologist will conduct a training session for all construction personnel. Training will include a description of California red-legged frogs, California tiger salamander, San Joaquin kit fox, and least Bell's vireo and their habitats as well as proper procedures for staff if any individuals are detected within the Proposed Action area. Photographs of California red-legged frogs and San Joaquin kit foxes will be distributed to all workers and contractors as a part of this training.
14. The Service-approved biologist will survey for California tiger salamander, California red-legged frog, and San Joaquin kit fox morning before the start of construction. If a California tiger salamander, California red-legged frog, or San Joaquin kit fox, or any animal that construction personnel believes may be one of these species, is encountered during Proposed Action construction, the following protocol shall be followed:
  - i. All work that could result in direct injury, disturbance, or harassment of the individual animal shall immediately cease.
  - ii. The foreman and on-site biologist shall be immediately notified.
  - iii. The on-site biologist shall immediately notify the Service via telephone or electronic mail when a California tiger salamander, whipsnake, California red-legged frog, or San Joaquin kit fox is encountered that may be in harm's way.
    - a. The on-site biologist shall move the California tiger salamander or California red-legged frog to a safe nearby location and monitor it until he/she determines that the animal(s) are not imperiled by predators, or other dangers. A San Joaquin kit fox encountered on the site will be allowed to leave the site on its own. In the case of trapped animals (e.g. in a ditch or trench), escape ramps or structures should be installed immediately to allow the animal(s) to escape, or the Service should be contacted for advice.
    - b. If at any time a California tiger salamander or California red-legged frog is discovered in the construction area by the on-site biologist or anyone else (including during pre-construction surveys), the on-site biologist shall move the animal to a safe location outside the exclusion barrier in an area that will remain undisturbed throughout the Proposed Action. If a San Joaquin kit fox is discovered in the construction area, it will be allowed to leave the site on its own. The biologist will monitor any translocated animal until it is determined that it is not imperiled by predators or other dangers. California tiger salamanders, whipsnakes, and California red-legged frogs will be translocated to appropriate habitat for their life cycle. California tiger salamanders found in burrows will be translocated to burrows, not a pond or creek.

15. All litter and construction debris will be disposed of offsite in accordance with State and local regulations. All trash and debris within the work area will be placed in containers with secure lids before the end of each work day in order to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish that may be left on-site. If containers meeting these criteria are not available, all rubbish will be removed from the Proposed Action site at the end of each work day.
16. The introduction and/or spread of invasive animal and plant species will be avoided to the maximum extent practicable.
17. Animal exclusion fencing will be erected and maintained around all construction areas. Installation of the fence will be performed under the supervision of a Service-approved biologist. Fencing will be made of reinforced plastic or plywood and will be buried a minimum of six inches into the ground. Animal exclusion fencing will be checked once per week by construction personnel trained by a Service-approved biologist to identify weaknesses and all compromised portions will be repaired and/or replaced immediately. No plastic netting or monofilament shall be used at the site because California red-legged frogs, California tiger salamanders, and other species may become entangled or trapped in it.
18. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the Proposed Action area to ensure that the California red-legged frog and California tiger salamander do not get trapped. This limitation will be communicated to the contractor through use of Special Provisions included in the bid solicitation package. Plastic mono-filament netting (erosion control matting), rolled erosion control products or similar material shall not be used at the Proposed Action site because California red-legged frogs, California tiger salamanders, and other species may become entangled or trapped in it.
19. Because California tiger salamanders and California red-legged frogs may take refuge in cavity-like and den-like structures such as pipes and may enter stored pipes and become trapped, all construction pipes, culverts, or similar structures that are stored at a construction site for one or more overnight periods will be either securely capped prior to storage or thoroughly inspected by the on-site biologist and/or the construction foreman/manager for these animals before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a California tiger salamander or California red-legged frog is discovered inside a pipe by the on-site biologist or anyone else, the protocol outlined in conservation Measure 14 will be followed and the Service-approved biologist shall move the animal to a safe nearby location (or, in the case of a San Joaquin kit fox, allow it to leave on its own) and monitor it until it is determined that it is not imperiled by predators or other dangers.

The Service issued a non-jeopardy Biological Opinion (81420-2010-F-1010) for the Proposed Action to Reclamation on February 3, 2011. The Biological Opinion contains the following non-discretionary terms and conditions that will apply to the Proposed Action. The text below is

verbatim from the Biological Opinion and the first one refers to the conservation measures listed immediately above.

*The Service has determined that the following reasonable and prudent measure is necessary and appropriate to minimize the effects of the Pipeline Maintenance Project on the California red-legged frog and California tiger salamander: Adverse effects to California red-legged frogs and California tiger salamanders and their habitat will be minimized to the extent possible.*

*In order to be exempt from the prohibitions of Section 9 of the Act, Reclamation must ensure compliance with the following terms and conditions, which implement the reasonable and prudent measure described above. These terms and conditions are nondiscretionary.*

1. *The following Terms and Conditions implement the Reasonable and Prudent Measure:*
  - a. *Reclamation shall require the Santa Clara Valley Water District to fully implement the Conservation Measures and Terms and Conditions in this Biological Opinion.*
  - b. *Reclamation shall require the Santa Clara Valley Water District to comply with the Reporting Requirements of this Biological Opinion, including a post construction report outlining how the Conservation Measures were implemented for this project.*
  - c. *Reclamation shall require the Santa Clara Valley Water District to not utilize plastic mono-filament netting (erosion control matting) or similar material containing netting at the project. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.*
  - d. *To avoid transferring disease or pathogens while handling California California red-legged frogs and California California tiger salamanders Reclamation shall require the Santa Clara Valley Water District to follow the Declining Amphibian Populations Task Force Fieldwork Code of Practice (Service 2005b)*
  - e. *If requested, before, during, or after completion of pipeline maintenance activities, Reclamation shall require the Santa Clara Valley Water District to allow immediate access to the project site by the Service, California Department of Fish and Game, or their designated agents, to review the effects of the project on the California tiger salamander, California red-legged frog, and their habitats.*

**Reporting Requirements**

*The Service and the Department of Fish and Game must be notified within one (1) working day of the finding of any injured or dead California red-legged frog, California tiger salamander or any unanticipated damage to their habitats associated with the proposed project. Injured listed species must be cared for by a licensed veterinarian or other qualified person(s), such as the Service-approved biologist. Notification must include the date, time, and precise location of the individual/incident clearly indicated on a USGS 7.5 minute quadrangle and other maps at a finer scale, as requested by the Service, and any other pertinent information. Dead individuals must be sealed in a Zip-lock® plastic bag containing a paper with the date and time when the animal was found, the location where it was found, and the name of the person who found it, and the bag containing the specimen frozen in a freezer located in a secure site. The Service contact persons are the Division Chief in the Endangered Species Program at telephone 916/414-6600; and the Resident Agent-in-Charge of the Service's Division of Law Enforcement at telephone 916/4146660. The Department of Fish and Game contact for Santa Clara County is Conrad Jones at telephone 650/328-2380, and the contact for San Benito County is Jess Cann at telephone 831/649-7194.*

*Reclamation through the Santa Water Valley Water District shall submit a post-construction compliance report prepared by the Service-approved biologist to the Sacramento Fish and Wildlife Office and the California Department of fish and Game within thirty (30) calendar days of the date of the completion of construction activity. This report shall detail (i) dates that construction occurred; (ii) pertinent information concerning the success of the project in meeting conservation measures; (iii) an explanation of failure to meet such measures, if any; (iv) known project effects on the California red-legged frog and California tiger salamander, if any; (v) occurrences of incidental take of California red-legged frogs and California tiger salamanders if any; (vi) documentation of employee environmental education; and (vii) other pertinent information.*

Reclamation's finding that implementation of the Proposed Action will result in no significant impact to the quality of the human environment is supported by the following findings:

**Findings****Surface Water Resources**

Draining up to 78 acre-feet from the pipeline will cause temporary increases in the rate and volume of runoff in receiving waters in the Proposed Action area. There is potential for up to 78 acre-feet of pipeline water to enter local waterways, open fields, swales, or wetlands. Consequently, Proposed Action activities will require a National Pollutant Discharge Elimination System Permit for discharges of non-storm water to waters of the State or United States.

Pipeline inspection and maintenance will not directly affect retail customers because shutdown will be done during the winter when water needs are less. Any deliveries that will be needed will be accomplished through local water and State water sources. Deliveries to San Benito County

Water District can be continued during this shutdown; however, flows to the SCVWD will cease during the Proposed Action.

Turbidity in receiving water could increase. Turbidity, temperature, and pH will be monitored during discharges and water will be treated or discharge rates will be modified if Regional Water Quality Control Board objectives were exceeded. SCVWD will adhere to their general permits.

Potential impacts to hydrology and water resources associated with the Proposed Action include potential to cause erosion, degrade water quality, and increase rates of runoff or flooding. The potential to cause erosion during maintenance activities is minimized through the Erosion Control Plan, Bank Protection Work, and re-vegetation (see Appendix A).

The Proposed Action has a potential to degrade water quality if exposed soils are flushed into waterways. Receiving water and discharge water will be monitored by a trained individual for turbidity prior to the discharge and periodically throughout the drainage operation. Silty or turbid water from Proposed Action activities will not be discharged into streams, lakes or storm drains.

Additionally, a fast rise and fall in water levels could cause bank failures and deposition of soil in the channel. Flow rates can be manipulated to control discharges and avoid sudden changes in receiving water flows. Receiving waters and flow paths will be evaluated for erosion potential and observed for erosion at the time of discharge. Pipeline discharge rates will be modified as needed to avoid erosion. If necessary, flow velocities will be reduced through implementation of energy dissipation BMPs and mitigation measures such as small settling ponds which function to pond water prior to release (see Appendix A). Soils and vegetation at discharge sites will be protected using a variety of conventional erosion control BMPs (see Appendix A).

Bank protection work will occur prior to a planned discharge in areas where banks within 100 feet of the discharge point appear to show signs of erosion or instability. Bank stabilization (hardscape methods) will be assessed before pipeline shutdown. Hardscape methods include:

- Gabions
- Rock Blanket (includes larger rip-rap with small rock fill)
- Sacked Concrete
- Articulated Concrete Mats
- Synthetic Cellular Confinement

The Proposed Action will be subject to a Clean Water Act (CWA) Section 404/Nationwide Permit from the U.S. Army Corps of Engineers for placement of any temporary or permanent BMPs into waterways (such as flow spreader dams/check dams, etc.), for any placement of fill during reclamation after valve repair in stream banks, and for any placement of fill into wetlands for access road repair.

Areas that show erosion or instability from natural or manmade conditions within 100 feet downstream of a discharge point (and up to 10 feet upstream of the point) will be hardened to further minimize the chances of erosion during water draining. Bank stabilization plans will be

prepared prior to the work and the work will begin early 2011. Bank stabilization will minimize erosion effects.

### **Groundwater Resources**

Reclamation will approve the shutdown, inspection, and maintenance of the Santa Clara Conduit. The Santa Clara Conduit will be drained and refilled. Draining the pipeline will cause temporary increases in the rate and volume of runoff in receiving waters in the Proposed Action area. Discharge of pipeline water into local waterways, open fields, swales, or wetlands will be likely. As the quantity of water that will percolate to the basin is small (approximately 78 acre-feet or less will be diverted to waterways) it will not have a substantial effect on groundwater quality or quantity.

### **Geology**

The Proposed Action consists of dewatering, inspection, and minor repair of approximately 10.6 miles of the Santa Clara Conduit which will not create additional geologic and soil-effects related to seismicity, including rupture along faults, subsidence, and liquefaction. There may be some previously existing geologic effects to the pipeline but these will not be a result of the Proposed Action.

Landslide hazards are prevalent throughout the Proposed Action area and along various areas of the pipeline. Discharge has the potential to cause erosion. Erosion and sedimentation could have a substantial impact on water quality; however, these will be minimized by implementation of BMPs such as bank stabilization, flow monitoring, and discharge dissipation as described previously.

The surfaces below several blow-off pipes located in banks were armored with rock riprap or concrete sandbag riprap during construction of the Santa Clara Conduit to minimize erosion during blow-off events. These drainage points will have minimal erosion and will not have bank stability issues. However, draining of the pipeline could occur across a stream bank, and could cause minor instability of the bank slope on less vegetated slopes or slopes with higher erosion potential. Bank stability will be ensured through erosion control measures for draining, including hardening of bank slopes where needed (see Appendix A).

Staging and vehicle access will require less than 0.05 acres of surface disturbance for each staging site which could be located in areas that are safe for equipment and workers. Staging will involve some off-road access, sometimes down steep gradients; however, such travel will not present a substantial threat to slope stability since access will only be by a few vehicles (from one to ten vehicles are required at a site, but it is likely only one or two will need to travel down the slope, while the rest could stay along existing roads at the top of the slope) and will only be traversed once to a few times for a particular project. Most pipeline features that must be accessed have been accessed in the past and workers travel on the easiest and safest route to the facility. In considering access routes, slopes of greater than 20 percent will generally be avoided if possible. Subsequent to access, any sloped area will be examined for evidence of instability and either revegetated or filled as necessary to prevent future landslide or erosion (see Appendix A).

Pipeline repair will occur within or around the pipeline and will not be affected by or result in poor slope stability. Repair will occur either within the pipeline itself or on the pipeline exterior.

### **Land Use**

Drainage, inspection and repair of 10.6 miles of the Santa Clara Conduit will not impact land use within the Proposed Action area as maintenance activities will occur during a period of low water need for agriculture and will be temporary. Once inspection and maintenance is completed, the Santa Clara Conduit will be placed back in operation.

### **Biological Resources**

Reclamation prepared a Biological Assessment for the PMP and submitted it along with a request for consultation with Service and National Marine Fisheries Service (NMFS). Informal consultation has been completed with NMFS on the PMP (see Appendix C of EA-10-050). The NMFS “not likely to adversely affect” letter covers the Proposed Action. Formal consultation on the Proposed Action was initiated with the Service January 6, 2011. The Service issued a non-jeopardy Biological Opinion (81420-2010-F-1010) for the Proposed Action to Reclamation on February 3, 2011 (see Appendix D of EA-10-050). Reclamation and SCVWD will comply with all terms and conditions in the incidental take statement provided with the Biological Opinion.

### **Cultural Resources**

The Proposed Action will result in Reclamation approving the draining, inspection, maintenance, and refilling of the Santa Clara Conduit. As this feature is not yet 50 years old, it is not considered a historic property as defined by the regulations at 36 CFR Part 60.4. When the Santa Clara Conduit was constructed, grounds in which it was constructed were significantly disturbed. Barring any new excavation into intact subsurface deposits, the Proposed Action needed to maintain and enhance the water conveyance feature have no potential to cause effects on historic properties pursuant to the regulations at 36 CFR Part 800.3(a)(1).

### **Indian Trust Assets**

There are no tribes possessing legal property interests held in trust by the United States in the water involved with this action, nor is there such a property interest in the lands designated to receive the water proposed in this action. This action will have no impact on Indian Trust Assets as there are none in the Proposed Action area. The nearest trust asset is Lytton Rancheria, which is approximately 76 miles northwest of the Proposed Action area.

### **Environmental Justice**

The Proposed Action will not disproportionately affect minority or low-income populations and communities.

### **Socioeconomic Resources**

Maintenance of existing facilities does not include provision of additional capacity for growth. No new water conveyance facilities, roads, or other infrastructure will be included as part of the Proposed Action. There will be no growth inducing impacts associated with implementing corrective maintenance defined under the Proposed Action. The maintenance labor will be sourced from the existing SCVWD mechanical, engineering, and field staff. The maintenance work has been performed on pipelines since initial installation in the 1960s on an as needed

basis. The Proposed Action will not result in substantial increased demands for labor that could lead to population growth within the Proposed Action area.

### **Air Quality**

Traffic is a main generator of particulate matter and precursors to ozone; however, activities will require relatively small maintenance fleets. The contribution of pollutants from maintenance vehicles relative to the contribution from the existing traffic in the Proposed Action area will be indiscernible. Most pipeline repair work will occur within a pipeline. Repair could involve some welding, soldering, and cementing of joints and pipeline components; however, the scale and size of repair work will be limited to a few areas. Repair work emissions will not interfere with implementation of the Basin Air Plan.

### **Global Climate**

Estimated emissions from the Proposed Action will be approximately 5 metric tons per year of carbon dioxide which is negligible compared to the Environmental Protection Agency's 25,000 metric tons per year threshold for annually reporting green house gas emissions. Therefore, there will be no significant impacts to the global climate due to the Proposed Action.

### **Cumulative Impacts**

Activities that have the potential to degrade water quality will be temporary and will not be expected to contribute to overall cumulative impacts. Discharge of pipeline water into local waterways, open fields, swales, or wetlands will be likely. As the quantity of water that will percolate to the basin is small (approximately 78 acre-feet or less will be diverted to waterways) it will not have a substantial effect on groundwater quality or quantity.

Cumulative impacts could occur as a result of geologic and soil-effects related to seismicity, including rupture along faults, subsidence, and liquefaction associated with the Proposed Action activities in combination with impacts associated with any of the other programs at the SCVWD. However, SCVWD will deploy BMPs to ensure stability.

All impacts will be temporary and are not expected to contribute to overall cumulative impacts. While some areas may support Special-Status species, the areas of temporary impact will be relatively small, and like-kind habitats surround the work areas. Thus, it can be anticipated that any species temporarily displaced by maintenance activities will be able to find other suitable habitat close by.

The Proposed Action will result in no cumulative impacts to cultural resources. When the water conveyance features of the San Felipe Division of the Central Valley Project reach 50 years or older, however, Reclamation may have to consider future maintenance activities for their potential to cause adverse effect to these resources.

There will be no cumulative impacts to Indian Trust Assets when added to other past, present, and future Proposed Actions as there are none in the action area.

When considered with the potential effects of other projects and programs, the Proposed Action will still not contribute to adverse effects to low-income and minority populations or socioeconomic resources.

The potential to cause cumulative air impacts with other SCVWD or local projects could only occur if other construction projects were occurring incidental to the Proposed Action activities. The District Operations Planning and Analysis Unit (OPAU) will determine any conflicting uses of resources or conflicting scopes of work within SCVWD and among other jurisdictions. If the OPAU allowed a construction project alongside another project, implementation of BMP Air Quality-2 will minimize any cumulative effects. BMP Air Quality-2 incorporates the San Francisco Bay Area Air Quality Management District guidelines for controlling construction-related emissions for inhalable particulate matter between 10 and 2.5 microns in diameter so as to minimize any individual project's contribution to an overall cumulative effect.

Green house gas impacts are considered to be cumulative impacts. The Proposed Action, when added to other existing and proposed actions, will not contribute to cumulative impacts to global climate change owing to the *de minimis* magnitude of annual greenhouse gas emissions.

Approval will not have highly controversial or uncertain environmental effects or involve unique or unknown risks. Impacts associated with the Proposed Action are minor, short-term, localized and temporary in nature; therefore, there are no significant cumulative impacts associated with this project.