RECLAMATION
Managing Water in the West

Categorical Exclusion Checklist

Cathodic Protection for Pacheco Conduit Reach 1 and Santa Clara Conduit

CEC-14-018

Prepared by:

Douglas Kleinsmith Date: 12/21/15
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Concurred by:

See Attachment A Date: See Attachment A
Archaeologist
Mid-Pacific Regional Office

Concurred by:

See Attachment B Date: See Attachment B
Native American Affairs Program Manager
Mid-Pacific Regional Office

Concurred by:

Shauna McDonald Date: 12/31/15
Shauna McDonald
Wildlife Biologist
South-Central California Area Office

Concurred by:

R Emerson Date: 1/4/2016
Rain Emerson
Supervisory Natural Resource Specialist
South-Central California Area Office

Approved by:

for M Jackson Date: 1/6/16
Michael Jackson
Area Manager
South-Central California Area Office

U.S. Department of the Interior
Bureau of Reclamation
South-Central California Area Office

Background

The Santa Clara Valley Water District (SCVWD) operates and maintains the Pacheco Conduit (PC) and Santa Clara Conduit (SCC), which are Federal facilities, on behalf of the Bureau of Reclamation (Reclamation). These conduits are the only large diameter pipeline systems operated by SCVWD that remain unprotected from external corrosion. These two pipelines systems, made up of three sections, were installed starting in 1983 and remain without external corrosion protection other than in the area of the Calaveras Fault crossing. With current corrosion technology, it is proposed for this project to upgrade the PC (Reach 1) and SCC with cathodic protection. Adding this technology will substantially extend the life of the pipeline asset as much as two to three times, improve public safety, and protect the environment by minimizing the potential for catastrophic leaks.

Proposed Action

SCVWD will install cathodic protection impressed current systems (ICCP) at four sites somewhat evenly distributed over the length of the PC and at one site along the SCC. Figures 1A and 1B are maps of vicinity of the sites. Figures 2A to 2E shows the details of the sites. These sites were chosen because of proximity to Pacific Gas and Electric (PG&E) power, proximity to SCVWD facilities, access from highway, minimal trenching, and terrain accommodating drilling. The five sites selected for the installation of ICCP systems will each be comprised of a rectifier, deep-well anode (300-feet deep; 8 inch hole), 20-feet high power pole, and associated above ground power supplied by existing PG&E facilities. A typical scenario is that SCVWD will install a 20-foot high power pole in their easement, mount an approved power junction box on the pole and cathodic protection power supply. Also within the area and easement no greater than 75 feet away from the pole, drill and install a 300 foot deep-well anode. From the deep-well anode, a wire bundle (3-inch conduit) will be trenched back to the power pole at a depth no greater than 30 inches. A second trench will be constructed to lay another 2-inch conduit from the power pole to the adjacent pipeline vault or existing corrosion test station. PG&E will install above ground power from their nearby pole to the shorter SCVWD's pole. Figure 3 is a schematic drawing of the installation components.

Drilling will be with wet mud with excess dirt removed and disposed of through a licensed hazardous waste facility. Multiple vehicles including a well drilling truck, dump truck, flatbed pickup truck, panel truck, back-hoe with transport truck, dumpster truck, water truck, and pickup trucks should all be expected on the sites during construction at different times. The well drilling operation should take three to ten days per site in sequence depending on weather and drilling conditions.

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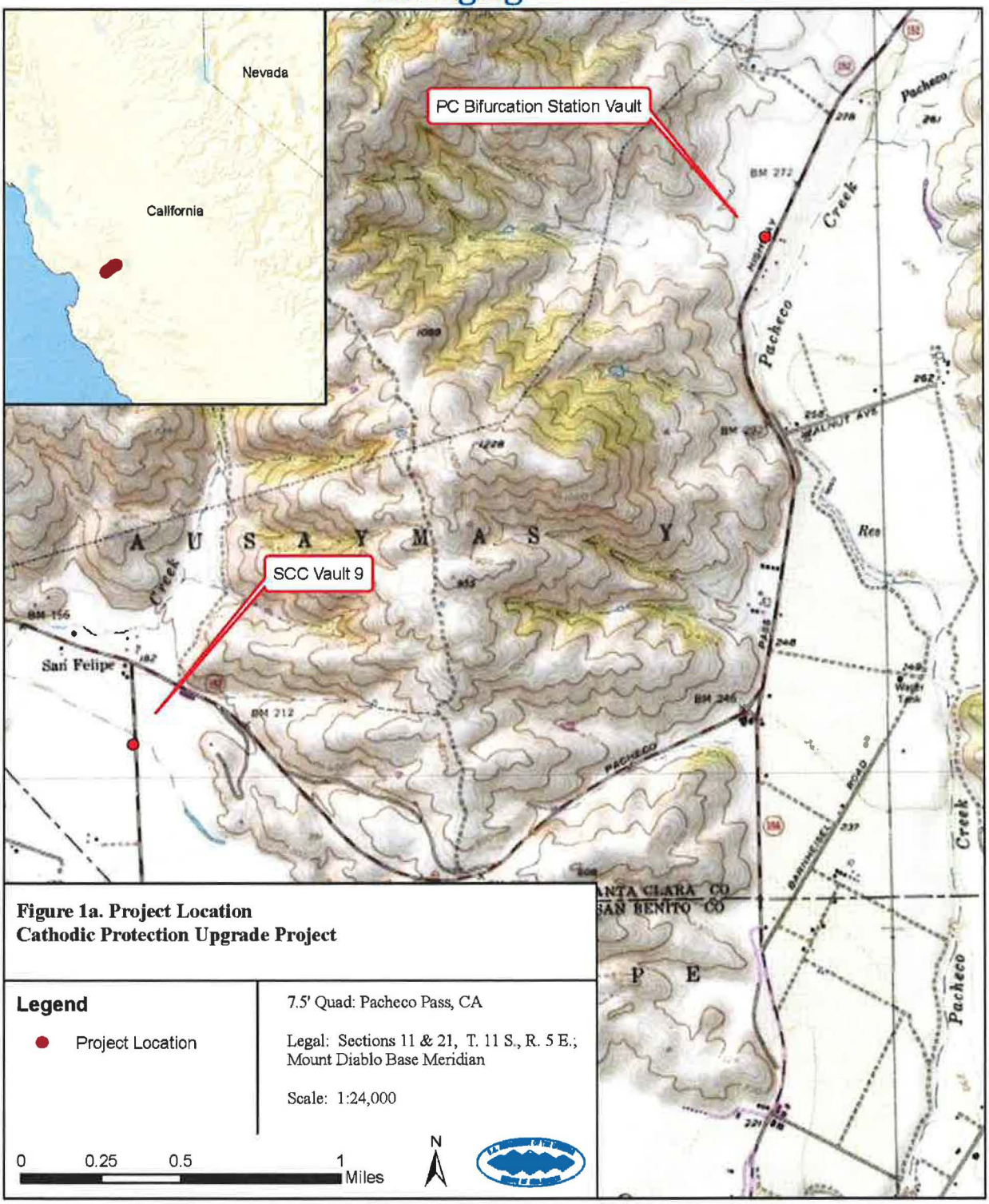

Figure 1a. Project Location
Cathodic Protection Upgrade Project

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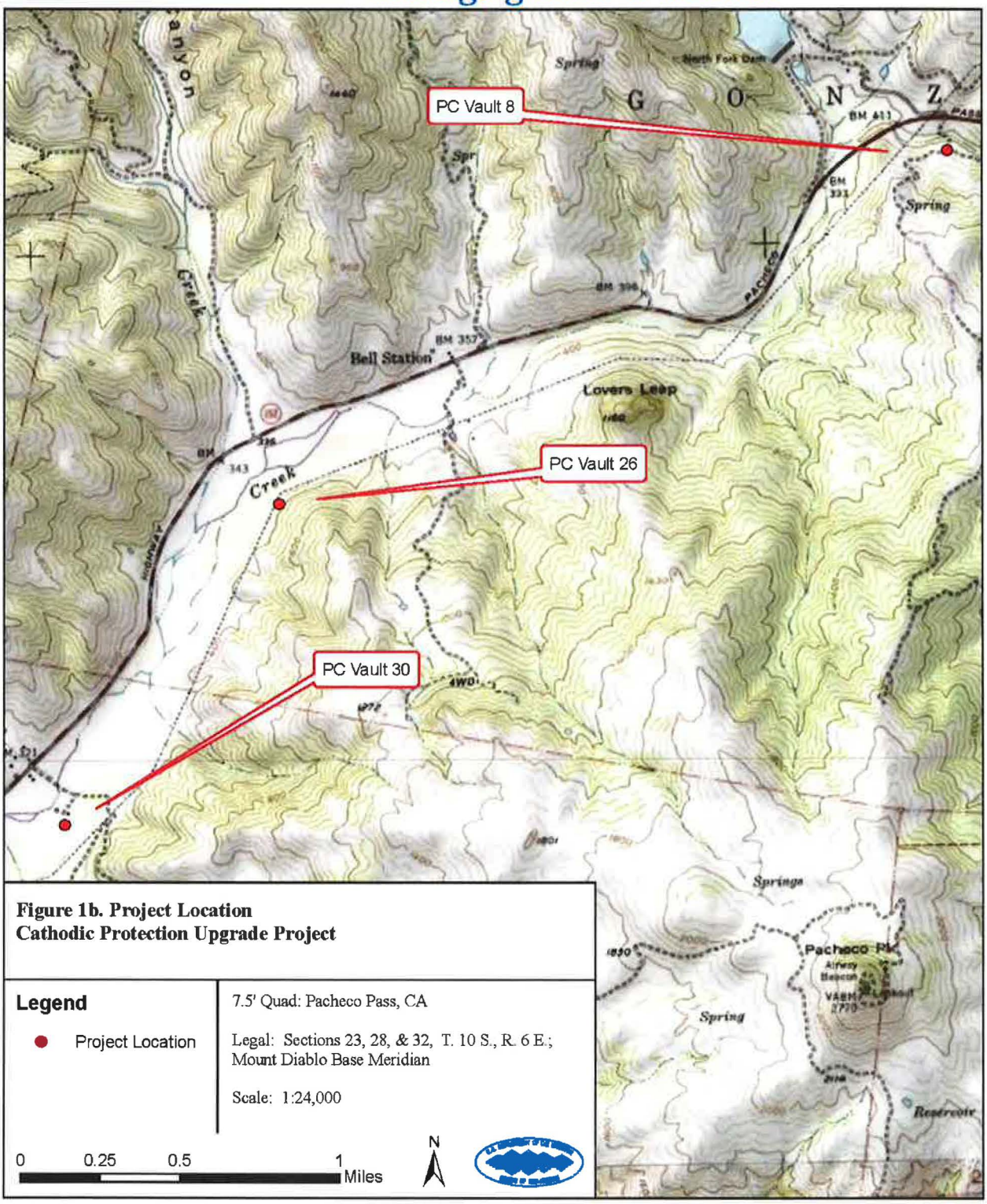
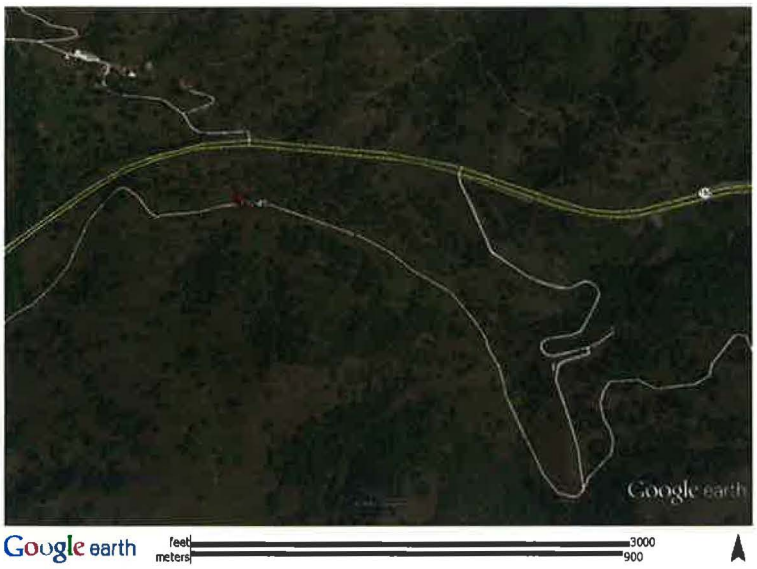


Figure 1b. Project Location
Cathodic Protection Upgrade Project



Name	Latitude	Longitude
PC #8	37 02 44.184 N	121 16 56.673 W

Figure 2A. PC 8 ICCP Site

Figure 2B SCC Vault 9 ICCP Site

Name	Latitude	Longitude
PC #26	37 01 49.728 N	121 19 15.079 W

Figure 2C PC 26 ICCP Site

Name	Latitude	Longitude
PC #30	37 00 56.549 N	121 19 59.177 W

Figure 2D. PC 30 ICCP Site

Name	Latitude	Longitude
BIF	36 59 23.284 N	121 22 57.767 W

Figure 2E. PC Bifurcation ICCP Site

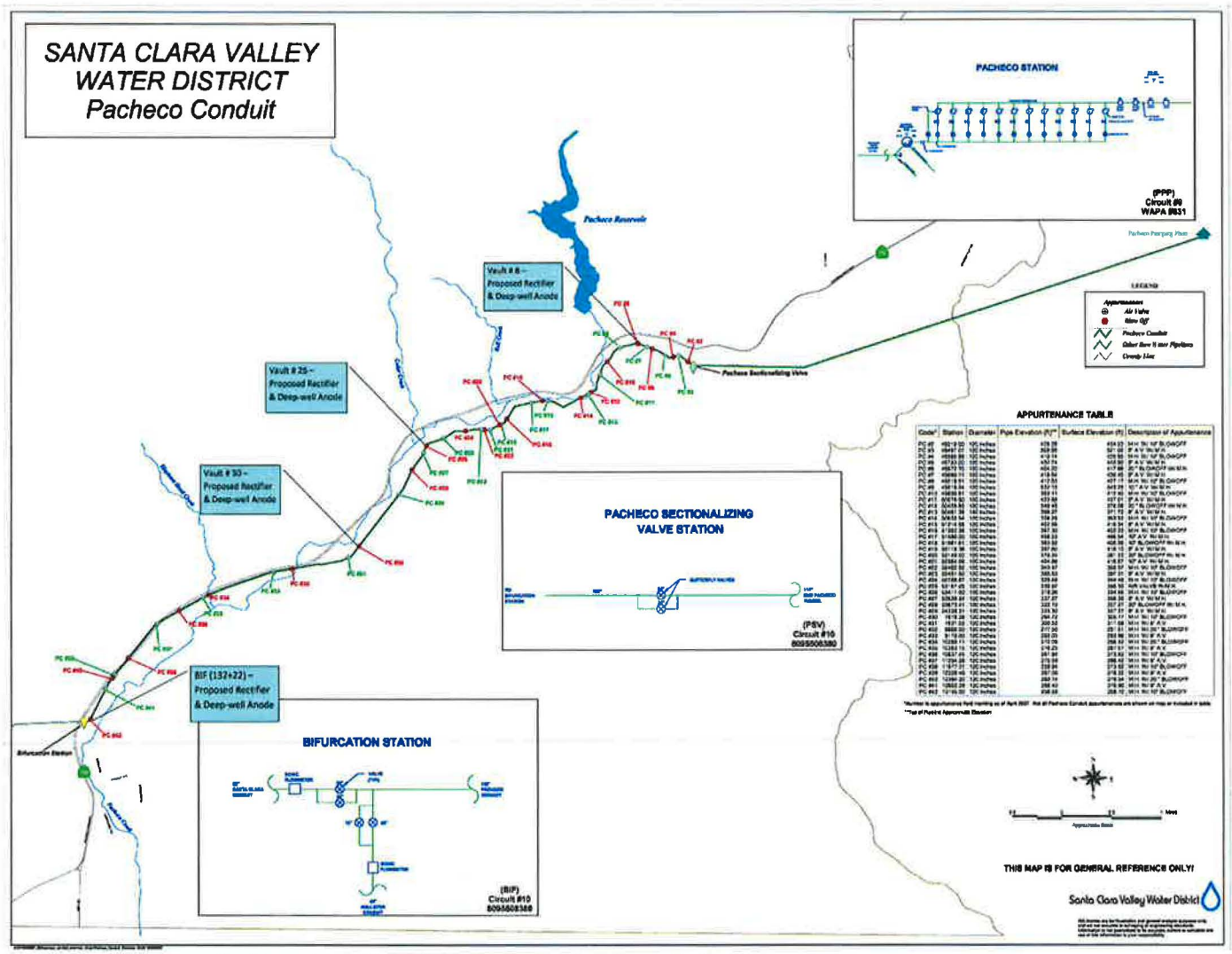


Figure 3. Schematic Drawing of Cathodic Protection Installation

Environmental Commitments

SCVWD would implement the following environmental commitments to avoid any environmental consequences associated with the Proposed Action (Table 1). Environmental consequences for resource areas assume the measures specified would be fully implemented.

Table 1. Environmental Commitments

Resource	Protection Measures
Biological Resources	1. SCVWD would ensure locations of infrastructure would be moved to avoid any burrows or similar crevices, taking into account that burrows extend underground for a distance away from the actual opening. 2. No work will be done during or within 3 days after a rain event of ½ inch or more 3. All work shall take place during daylight hours with no work at twilight or night. 4. Trenches shall be either securely sealed to prevent animal entry or provided with earthen escape ramps sloped no steeper than 2:1 spaced every 15 feet along the trench.

Exclusion Category

516 DM 14.5 C.3. Minor construction activities associated with authorized projects which correct unsatisfactory environmental conditions or which merely augment or supplement, or are enclosed within existing facilities.

Extraordinary Circumstances

Below is an evaluation of the extraordinary circumstances as required in 43 CFR 46.215.

1. This action would have a significant effect on the quality of the human environment (40 CFR 1502.3). No ☒ Uncertain ☐ Yes ☐

2.	This action would have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA Section 102(2)(E) and 43 CFR 46.215(c)).	No	☒	Uncertain	☐	Yes ☐
3.	This action would have significant impacts on public health or safety (43 CFR 46.215(a)).	No	☒	Uncertain	☐	Yes ☐
4.	This action would have significant impacts on such natural resources and unique geographical characteristics as historic or cultural resources; parks, recreation, and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (43 CFR 46.215 (b)).	No	☒	Uncertain	☐	Yes ☐
5.	This action would have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks (43 CFR 46.215(d)).	No	☒	Uncertain	☐	Yes ☐
6.	This action would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (43 CFR 46.215 (e)).	No	☒	Uncertain	☐	Yes ☐
7.	This action would have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)).	No	☒	Uncertain	☐	Yes ☐
8.	This action would have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)).	No	☒	Uncertain	☐	Yes ☐
9.	This action would have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species (43 CFR 46.215 (h)).	No	☒	Uncertain	☐	Yes ☐
10.	This action would violate a Federal, tribal, State, or local law or requirement imposed for protection of the	No	☒	Uncertain	☐	Yes ☐

environment (43 CFR 46.215 (i)).

11.	This action would affect ITAs (512 DM 2, Policy Memorandum dated December 15, 1993).	No	☒	Uncertain	☐	Yes ☐
12.	This action would have a disproportionately high and adverse effect on low income or minority populations (EO 12898) (43 CFR 46.215 (j)).	No	☒	Uncertain	☐	Yes ☐
13.	This action would limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007, 43 CFR 46.215 (k), and 512 DM 3)).	No	☒	Uncertain	☐	Yes ☐
14.	This action would contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species Federal Noxious Weed Control Act, EO 13112, and 43 CFR 46.215 (l)).	No	☒	Uncertain	☐	Yes ☐

NEPA Action Recommended

☒ CEC – This action is covered by the exclusion category and no extraordinary circumstances exist. The action is excluded from further documentation in an EA or EIS.

☐ Further environmental review is required, and the following document should be prepared.

☐ EA
☐ EIS

Attachment A
Cultural Resources Determination

CULTURAL RESOURCE COMPLIANCE
Mid-Pacific Region
Division of Environmental Affairs
Cultural Resources Branch

MP-153 Tracking Number: 14-SCAO-124

Project Name: Cathodic Protection Upgrade Project on the Pacheco and Santa Clara Conduits

NEPA Document: CEC-14-018

MP 153 Cultural Resources Reviewer: Amy J. Barnes

Date: December 15, 2015

This proposed undertaking by Reclamation is to issue a permit to the Santa Clara Valley Water District (SCVWD) to upgrade cathodic protection on the Pacheco Conduit (PC) and Santa Clara Conduit (SCC), which are buried pipelines located approximately 10 miles east of the city of Gilroy, California. These conduits are owned by Reclamation as part of the San Felipe Division of the Central Valley Project (CVP), while the SCVWD operates and maintains these facilities. This is the type of action that has the potential to cause effects to historic properties pursuant to 36 CFR §800.3 of the Section 106 implementing regulations. As a result of this determination, Reclamation implemented the steps in the Section 106 process as outlined at §800.3 to §800.6.

The SCVWD proposes to install cathodic protection impressed current systems at four locations at roughly even intervals along the PC and at one location on the SCC. The purpose of installing this technology is to protect the pipelines from external corrosion. The construction elements that will occur at each location involve the following:

- drilling an 8-inch diameter hole approximately 300 feet deep to install a deep-well anode;
- installing up to approximately 75 feet of 3-inch diameter electrical conduit in a trench measuring up to 30 inches deep to connect the deep-well anode to a new power pole;
- installing a 20-foot high power pole and mounting a rectifier and anode power junction box;
- installing an 2-inch diameter electrical conduit to connect the new power pole to an adjacent pipeline vault or existing corrosion test station; and
- installing up to approximately 100 feet of new overhead power line from the new power pole to an existing Pacific Gas and Electric power line.

Drilling methods will include using a water and clay mud slurry with excess dirt and mud disposed of through a licensed hazardous waste facility. Equipment includes a drilling truck, flat bed pickup, vacuum excavation truck, back-hoe, and other construction related heavy equipment. Each location will be accessed via existing maintenance roads along the conduits.

Reclamation determined that the project area includes four separate locations along the PC and one location on the SCC. The work areas measure approximately 0.83 acres (PC Bifurcation Station Vault), 0.05 acres (near PC Vault 30), 0.27 acres (PC Vault 26), 0.14 acres (PC Vault 8), and 0.14 acres (SCC Vault 9), for a collective total of approximately 1.43 acres. The project area is located in Sections 11 and 21 in T. 11 S., R. 5 E. and in Sections 23, 28, and 32 in T. 10 S., R. 6 E., Mount Diablo Baseline and

CULTURAL RESOURCE COMPLIANCE
Mid-Pacific Region
Division of Environmental Affairs
Cultural Resources Branch

Meridian, as depicted on the Pacheco Pass and San Filipe 7.5' USGS topographic quadrangle maps (Figures 2a through 2e, enclosed). The lands surrounding the conduits are predominantly characterized by agricultural lands and rural residential development near the city of Gilroy and along Highway 152. The proposed project is confined to the 60-foot wide pipeline easement, within the horizontal and vertical extent of disturbance from original pipeline construction.

The historic property identification efforts included an internal archival records review and two record searches conducted through the Northwest Information Center. Due to the nature and scope of the proposed project to conduct ground disturbing activities in fill material above the two conduits, Reclamation determined that a pedestrian survey of the APE was not warranted. The PC and SCC are the only cultural resources in the APE. Built in the 1980s, the PC and SCC do not yet meet the National Register of Historic Places general threshold of 50 years of age for consideration as a historic property, however, they are components of the San Felipe Division of the CVP. The CVP, a large-scale Federal water storage, transfer, and delivery system that significantly contributed to agricultural development in California is considered eligible for listing in the National Register under Criterion A. Assuming, for purposes of this project only, that the San Felipe Division, including the PC and the SCC, is a contributing component of the CVP, Reclamation finds no adverse effect for the undertaking.

Reclamation entered into consultation with the California State Historic Preservation Officer (SHPO) on September 23, 2015, seeking their concurrence on a single finding of "no adverse effect to historic properties pursuant to 36 CFR § 800.5(b)." SHPO concurred with Reclamations' findings and determination on November 25, 2015 (consultation attached).

After reviewing CEC-14-018, dated December 2015 entitled *Cathodic Protection for the Pacheco Conduit Reach 1*, I concur with Item 8 that this action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places.

This memorandum is intended to convey the completion of the NHPA Section 106 process for this undertaking. Please retain a copy in the administrative record for this action. Should changes be made to this project, additional NHPA Section 106 review, possibly including consultation with the State Historic Preservation Officer, may be necessary. Thank you for providing the opportunity to comment.

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
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November 25, 2015 In reply refer to: BUR_2015_1001_001

Ms. Anastasia T. Leigh
Regional Environmental Officer
Bureau of Reclamation
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825-1898

Re: National Historic Preservation Act (NHPA) Section 106 Consultation for the Cathodic Protection Upgrade Project on the Pacheco and Santa Clara Conduits, Santa Clara County, California (14-SCAO-124)

Dear Ms. Leigh:

Thank you for your letter dated September 23, 2015, requesting my concurrence on your finding of no adverse effect with regard to the proposed Cathodic Protection Upgrade Project on the Pacheco and Santa Clara Conduits in Santa Clara County, California. The Bureau of Reclamation is (Reclamation) is consulting with me pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36 CFR Part 800 (as amended 8-05-04). Along with your consultation letter, you also provided the following documents:

- *Project Location, Cathodic Protection Upgrade Project* (maps);
- *Area of Potential Effects (APE), Cathodic Protection Upgrade Project (maps).*

Reclamation proposes to issue a permit to the Santa Clara Valley Water District (SCVWD) to upgrade cathodic protection on the Pacheco Conduit (PC) and Santa Clara Conduit (SCC), which are buried pipelines, located approximately 10 miles east of the city of Gilroy, California. The SLWD proposes to install cathodic protection impressed current systems at four locations at roughly even intervals along the PC and at one location on the SCC. Activities proposed at each of the five locations consist of drilling an 8-inch diameter hole approximately 300 feet deep to install a deep-well anode; installing up to 75 feet of 3-inch diameter electrical conduit in a trench measuring up to 30 inches deep to connect the deep-well anode to a new power pole; installing a 20-foot high power pole and mounting rectifier and anode power junction box; installing a 2-inch diameter electrical conduit to connect the new power pole to an adjacent pipeline vault or existing corrosion test station; and installing up to approximately 100 feet of new overhead power line from the new power pole to an existing Pacific gas and Electric Co. power line. Equipment utilized includes a drilling truck, flat bed pickup, vacuum excavation truck, back-hoe, and other construction related heavy equipment. Each location will be accessed via existing maintenance roads along the conduits.

Reclamation has determined that the area of potential effects (APE) for this undertaking consists of five discontiguous areas totaling 1.43 acres in aggregate. Your letter and attached technical report document Reclamation's efforts to identify historic properties in the APE. These efforts included

consultation with non-federally recognized Indian tribes and records searches conducted in June of 2014 and May of 2015. As a result of these efforts, Reclamation identified two cultural resources (the Pacheco Conduit and the Santa Clara Conduit, both components of the San Felipe Division of the Central Valley Project) in the APE. For the purposes of the current undertaking only, Reclamation is proposing to treat the San Felipe Division, including the Pacheco Conduit and the Santa Clara Conduit, as contributing components of the Central Valley Project. Your letter explains that Reclamation holds that a cultural resources pedestrian survey was not necessary due to the nature and scope of the proposed project to conduct ground disturbing activities in fill material and previously disturbed areas above the two conduits.

Reclamation applied the criteria of adverse effect to the current undertaking and found that the proposed action of installing cathodic protection upgrades would result in no significant alterations to the historic characteristics that would make the San Felipe Division of the Central Valley Project eligible for the National Register. Reclamation is requesting my review and comment on the delineation of the APE and their efforts to identify historic properties. Additionally, Reclamation is requesting my concurrence with their finding of no adverse effect to historic properties. After reviewing your submission I have the following comments:

- Pursuant to 36 CFR 800.4(a)(1), I have no objections to the APE as defined.
- Reclamation has proposed to presume, for the purpose of this undertaking only, that the Pacheco Conduit and the Santa Clara Conduit, as components of the San Felipe Division of the Central Valley Project are eligible for the National Register of Historic Places (NRHP). I do not object.
- Pursuant to 36 CFR 800.5(c)(1), **I concur with your finding of "no adverse effect to historic properties" for this undertaking.**

Thank you for seeking my comments and considering historic properties as part of your project planning. Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800. If you have any questions, please contact Patrick Riordan of my staff at (916) 445-7017 or Patrick.Riordan@parks.ca.gov or Kathleen Forrest at (916) 445-7022 or Kathleen.Forrest@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Attachment B
Indian Trust Assets Determination

Re: ITA request for cathodic protection of Pacheco Conduit

RIVERA, PATRICIA <privera@usbr.gov> Thu, Mar 13, 2014 at 6:44 AM

To: DOUGLAS KLEINSMITH <dkleinsmith@usbr.gov>

Doug,

I reviewed the proposed action to permit Santa Clara Valley Water District to install cathodic protection impressed current systems (ICCP) at four sites somewhat evenly distributed over the length of the Pacheco Conduit in San Benito County. Sites were chosen because of proximity to PG&E power, proximity to SCVWD facilities, access from highway, minimal trenching, and terrain accommodating drilling.

The four sites selected for the installation of ICCP systems will each be comprised of a rectifier, deep-well anode (300' deep; 8" hole), 20' high power pole, and associated above ground power supplied by existing PG&E facilities.

The proposed action does not have a potential to impact Indian Trust Assets. The nearest Indian Trust Asset is a Public Domain Allotment, approximately 19 miles south of the project location.

Patricia Rivera
Native American Affairs Program Manager
US Bureau of Reclamation
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(916) 978-5194