

# RECLAMATION

*Managing Water in the West*

FINDING OF NO SIGNIFICANT IMPACT

## **Western Area Power Administration's Proposed Installation of Security Gates at the Tracy Substation Facility**

FONSI-16-034



U.S. Department of the Interior  
Bureau of Reclamation

November 2016

## **Mission Statements**

The mission of the Department of the Interior is to protect and manage the Nation's natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

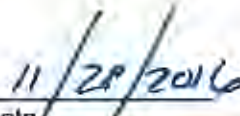
The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.


**BUREAU OF RECLAMATION**  
**South-Central California Area Office, Fresno, California**

**FONSI-16-034**

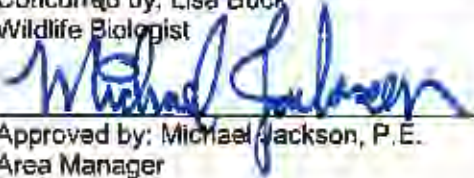
**Western Area Power Administration's  
Proposed Installation of Security Gates  
at the Tracy Substation Facility**

  
Prepared by: Rain L. Emerson  
Supervisory Natural Resources Specialist

  
Date

  
Concurred by: Lisa Buck  
Wildlife Biologist

  
Date

  
Approved by: Michael Jackson, P.E.  
Area Manager

  
Date



# Introduction

The Western Area Power Administration (WAPA) owns the facilities and the land at the Tracy Substation proper; however, the Bureau of Reclamation (Reclamation) owns the land and buildings at the entrance of the Tracy Substation along Kelso Road. In order to implement required security updates at the Tracy Substation, WAPA has requested authorization from Reclamation to install security upgrades in three separate locations on property owned by Reclamation at the Tracy Substation Facility located near the city of Tracy in Contra Costa County, California.

## Proposed Action

Reclamation will approve the installation of security upgrades by WAPA at three sites within Reclamation land at the Tracy Substation Facility. Specific activities include retrofitting the existing gates, installing card readers and concrete security posts at two entrance locations into the substation, digging trenches for the utility hookup from the card reader to the gates, and installing conduits from the base of the card reader to the new gate operator on the exterior of Reclamation's Control Building. Access to the site will be via existing paved roads and on the Delta-Mendota Canal's O&M road, with no road improvements required. Specific locations of the three security upgrades are included in Attachment A.

## Findings

In 2010, WAPA released a Draft Environmental Assessment (DOE/EA-1697) for public review. The Draft EA analyzed WAPA's operation and maintenance (O&M) program for its existing electrical transmission line infrastructure, right-of-way (ROW), and access roads within the San Joaquin Valley. The O&M program activities include, but are not limited to, facility inspection/repair, vegetation management, equipment upgrades, and access road improvements. Comment letters received on the Draft EA were incorporated into the Final EA and a Findings of No Significant Impact (FONSI) was issued by WAPA on December 2, 2011. The Final EA and FONSI issued by WAPA can be found at the following website: <https://www.wapa.gov/regions/SN/environment/Pages/san-joaquin-valley.aspx>. The analysis included in WAPA's Final EA is incorporated by reference.

Based on WAPA's Final EA including implementation of applicable standard operating procedures and resource-specific measures identified in Final DOE/EA-1697, Reclamation finds that the Proposed Action described above is not a major federal action that will significantly affect the quality of the human environment. Following are the reasons why the impacts of the Proposed Action are not significant:

- The Proposed Action will not have a significant effect on the quality of the human environment (40 CFR 1502.3).
- The Proposed Action will not 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)).
- The Proposed Action will not significantly impact public health or safety (40 CFR 1508.27(b)(3)).
- The Proposed Action will not significantly impact natural resources and unique geographical characteristics such 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 (Executive Order (EO) 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (40 CFR 1508.27(b)(3) and 43 CFR 46.215(b)).
- The Proposed Action will not have possible effects on the human environment that are highly uncertain or involve unique or unknown risks (40 CFR 1508.27(b)(5)).
- The Proposed Action will not 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)).
- The Proposed Action will not have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)).
- The Proposed Action will not 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)). Reclamation consulted with the State Historic Preservation Officer (SHPO) and received concurrence on a finding of no adverse effect to historic properties pursuant to 36 CFR § 800.5(b). Reclamation's determination and SHPO concurrence are included in Attachment B.
- The Proposed Action will not 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)). Reclamation has determined that potential effects to proposed or listed species or critical habitat under the Endangered Species Act of 1973, as amended (16 U.S.C. §1531 et seq.), and birds protected under the Migratory Bird Treaty Act (16 U.S.C. §703 et seq.) from the Proposed Action are covered under WAPA's programmatic informal consultation with the U.S. Fish and Wildlife Service.
- The Proposed Action will not violate a Federal, tribal, State, or local law or requirement imposed for protection of the environment (43 CFR 46.215 (i)).

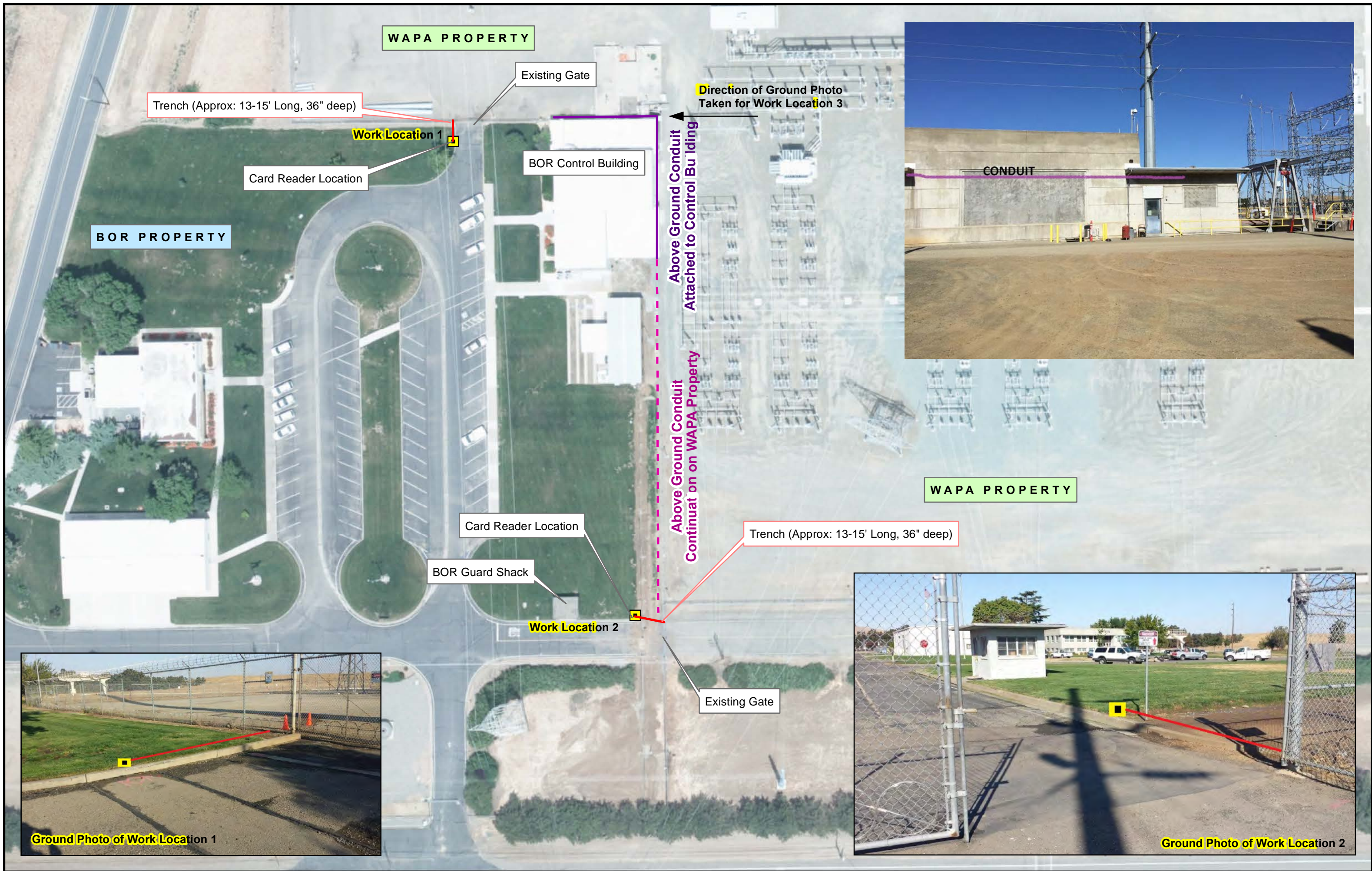
- The Proposed Action will not affect any Indian Trust Assets (512 DM 2, Policy Memorandum dated December 15, 1993).
- The Proposed Action will not disproportionately affect minorities or low-income populations and communities (EO 12898, 43 CFR 46.215 (j)).
- The Proposed Action will not limit access 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)).
- The Proposed Action will not 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)).

# **Attachment A**

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## **Proposed Action Area**







## **Attachment B**

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### **Reclamation's Cultural Resources Determination**

# **CULTURAL RESOURCES COMPLIANCE**

## **Division of Environmental Affairs**

### **Cultural Resources Branch (MP-153)**

**MP-153 Tracking Number:** 16-SCAO-242

**Project Name:** Western Area Power Administration (WAPA) Project to Perform Security Upgrades at Tracy Substation Facility, Alameda County, California

**NEPA Contact:** Jennifer Lewis and Rain Emerson, Natural Resource Specialists

**MP 153 Cultural Resources Reviewer:** BranDee Bruce, Architectural Historian

**Date:** November 28, 2016

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The Bureau of Reclamation proposes to provide a letter of approval to WAPA for security upgrades at the Tracy Substation Facility, which will be partially implemented on Reclamation lands adjacent to the Tracy Pumping Plant (C.W. “Bill” Jones Pumping Plant), a component of the Central Valley Project (CVP), in Alameda County, California. Reclamation’s approval for the proposed project on Federal land constitutes an undertaking as defined in 36 CFR § 800.16(y) and is a type of activity that has the potential to cause effects to historic properties under 36 CFR § 800.3(a).

The proposed project would upgrade existing security measures on Reclamation and WAPA lands at the Tracy Substation Facility, immediately adjacent to Reclamation lands for the Tracy Pumping Plant. Part of the proposed work will occur on Reclamation and includes retrofitting the existing gates, installing card readers at two entrance locations into the substation, digging trenches for the utility hookup from the card reader to the gates, and installing conduits from the base of the card reader to the new gate operator on the exterior of Reclamation’s Control Building. Access to the site will be via existing paved roads and on the canal’s operations and maintenance road, with no road improvements required.

In an effort to identify historic properties, in-house files were reviewed and background research was completed, which identified the Tracy Pumping Plant (and associated buildings, including the Control Building) as having been recorded in 2001, with an update to the site form in 2002. The 2002 update recommended the Tracy Pumping Plant as eligible for the National Register of Historic Places (National Register), but no consensus was received. The 2002 updated site form was also vague on if any of the associated buildings were contributing or non-contributing to the Tracy Pumping Plant’s eligibility. Based on this, for the purposes of this undertaking only, Reclamation is treating the Tracy Pumping Plant as eligible for the National Register under Criterion A, as a component of the CVP, with the and the Control Building as a contributing component to the Tracy Pumping Plant.

Reclamation applied the criteria of adverse effect and the Secretary of the Interior Standards for the Treatment of Historic Properties to the Tracy Pumping Plant and Control Building for the proposed undertaking and determined that a finding of no adverse effect to historic properties pursuant to 36 CFR § 800.5(b) is appropriate for the undertaking. Reclamation hand delivered a consultation letter on November 16, 2016 to the California SHPO and asked for expedited

**CULTURAL RESOURCES COMPLIANCE**  
**Division of Environmental Affairs**  
**Cultural Resources Branch (MP-153)**

review. Reclamation received concurrence from them on November 28, 2016, on a finding of no adverse effect pursuant to 36 CFR §800.5(b). Consultation correspondence between Reclamation and the SHPO has been provided with this cultural resources compliance document for inclusion in the administrative record for this action.

This document serves as notification that Section 106 compliance has been completed for this undertaking. Please note that, if project activities change, additional NHPA Section 106 review, including further consultation with the SHPO, may be required. Thank you for providing the opportunity to comment.

**Attachments**

Letter: Reclamation to SHPO dated 11/16/2016

Letter: SHPO to Reclamation dated 11/28/2016



# United States Department of the Interior

BUREAU OF RECLAMATION  
Mid-Pacific Regional Office  
2800 Cottage Way  
Sacramento, CA 95825-1898

IN REPLY REFER TO:

NOV 16 2016

MP-153  
ENV-3.00

## HAND DELIVERY

Ms. Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Subject: EXPEDITED REVIEW REQUESTED: National Historic Preservation Act (NHPA)  
Section 106 Consultation for the Proposed Western Area Power Administration  
(WAPA) Project to Perform Security Upgrades at Tracy Substation Facility, Alameda  
County, California (16-SCAO-242)

Dear Ms. Polanco:

The Bureau of Reclamation is initiating consultation under Title 54 USC § 306108, commonly known as Section 106 of the NHPA, and its implementing regulations found at 36 CFR § 800, for the subject project located in Alameda County, California (Enclosure 1: Figure 1). Reclamation proposes to provide a letter of approval to WAPA for security upgrades at the Tracy Substation Facility, which is located on Reclamation lands. Reclamation determined that issuing the approval letter is an undertaking as defined in 36 CFR § 800.16(y) and is a type of activity that has the potential to cause effects on historic properties under 36 CFR § 800.3(a). We are entering into consultation with you on this undertaking and request concurrence on our finding of no adverse effect to historic properties pursuant to 36 CFR § 800.5(b). Due to WAPA's need to begin construction on these important security upgrades, our office respectfully requests an expedited review of this undertaking.

The proposed project would upgrade existing security measures on Reclamation lands at the Tracy Substation Facility. Part of the proposed work will occur on WAPA lands, and is not subject to this consultation. The upgrades partially or wholly on Reclamation lands include retrofitting the existing gates, installing card readers at two entrance locations into the substation, digging trenches for the utility hookup from the card reader to the gates, and installing conduits from the base of the card reader to the new gate operator on the exterior of Reclamation's Control Building. Detailed work includes installing three posts, two of which are concrete filled 8-inch diameter steel protective posts, and a third that is a 4-inch diameter post for a card reader key pad, in the lawn behind existing curbs. Each of these posts will be set in a poured in place concrete base that will be 2-feet in diameter and set 3-feet deep in the ground. Two 1-inch diameter conduits will run underground to the newly installed gate operator, with the trench for the conduits excavated to a depth of approximately 3-feet deep and 2-feet wide, for a length no

more than 15-feet. The trench will be backfilled and any repairs to existing sprinklers will be completed, along with the replacement of sod over the trench. Two above ground 2-inch conduits will be run on WAPA's property from one of the new pole installation areas, and then will be attached to the exterior of Reclamation's Control Building (Enclosure 2).

Reclamation has determined the area of area of potential effects (APE) for the proposed project is located in Section 31 of T. 1 S., R. 4 E., Mount Diablo Base and Meridian, as depicted on the Clifton Court Forebay 7.5' U.S. Geological Survey topographic quadrangle map (Enclosure 1: Figure 1). The APE is contained within a 1.36 acre area within the Tracy Substation Facility, near the WAPA Substation, and is within a very disturbed and industrial context (Enclosure 1: Figure 2). The maximum vertical APE for project activities is anticipated to be no more than 3-feet deep for running conduit and installing posts. Existing roads and parking areas will be used for access and any required staging. All work is located either on built environment structures or within a highly disturbed context.

In an effort to identify historic properties in the APE, Reclamation reviewed in-house files and previous field investigations in the vicinity. Reclamation conducted a records search in 2008 that covered the APE, and little modification has occurred on those Reclamation lands in the subsequent years. The Tracy Pumping Plant, now named the Bill "C.W." Banks Pumping Plant (Pumping Plant), and the Tracy Switchyard (Tracy Substation) were originally recorded in 2001 on the same Department of Parks and Recreation (DPR) form (P-01-01441). Eligibility recommendations were confusing in this DPR form, but it appears the properties were originally recommended not eligible. In 2002, the Tracy Pumping Plant (P-01-01442) was separated from the Tracy Switchyard (P-01-01443), and both DPR forms were updated (Enclosure 3). The Pumping Plant was recorded, along with 3 buildings (one storage building and two office buildings, one of which is the Control Building), and recommended as eligible under Criteria A and C for listing in the National Register of Historic Places (National Register), although it is unclear if the buildings are contributing components to the Pumping Plant. The Tracy Switchyard was recommended as ineligible, which received SHPO consensus in 2005 (Enclosure 3). It is unclear if the Pumping Plant ever received concurrence, so the eligibility of the Pumping Plant and any contributing or non-contributing components is still unknown. In an effort to meet deadlines for WAPA, and for the purposes of this undertaking, Reclamation will treat the Pumping Plant as eligible under Criterion A, as a component of the Central Valley Project, with the Control Building as a contributing component to the presumed eligible Pumping Plant.

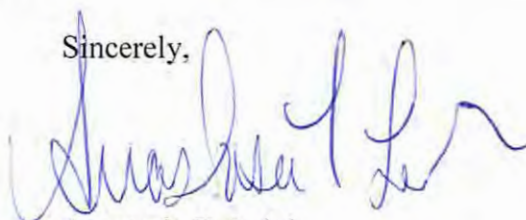
All proposed activities will be conducted entirely within the constraints of the built environment or in highly disturbed areas from the construction of the Pumping Plant and Substation; therefore, there exists very little potential to encounter sites of religious and cultural significance to Indian tribes pursuant to the regulations at 36 CFR § 800.3(f)(2) and 36 CFR § 800.4(a)(4). As such, Reclamation did not consult with Indian tribes regarding this undertaking pursuant to 36 CFR § 800.2(c).

Reclamation applied the criteria of adverse effect [36 CFR § 800.5(a)(1)] and the Secretary of the Interior Standards for the Treatment of Historic Properties [36 CFR § 68.3(a)] as described for the preservation of a historic property outlined in the regulations at 36 CFR § 68.3(a)(2) and found that the proposed activities would result in no adverse effect to historic properties pursuant to 36 CFR § 800.5(b). The only physical impact to any component of the eligible property is the attachment of a conduit to the exterior of the Control Building. There will be no change in

overall appearance to the building or larger Pumping Plant complex as a whole, as the conduits are fairly small features on the exterior and are not typically visible components. The posts being installed adjacent to the Control Building and within the larger complex of the Pumping Plant will not affect the appearance of the historic property. The overall sense of time and place will remain the same, as will the integrity of workmanship, materials, design, setting, feeling, location, and association.

Based on the above discussion and the enclosed documentation, Reclamation has reached a finding of no adverse effect to historic properties. We invite your comments on the delineation of the APE and our efforts to identify historic properties. Reclamation also requests your concurrence with our finding of no adverse effect for the proposed undertaking. If you have any questions or concerns about this project, please contact Ms. Brandee Bruce, Architectural Historian, at 916-978-5039 or [bbruce@usbr.gov](mailto:bbruce@usbr.gov).

Sincerely,



Anastasia T. Leigh  
Regional Environmental Officer

Enclosures – 3



**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



November 28, 2016

In reply refer to: BUR\_2016\_1116\_001

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

Subject: Section 106 Consultation for the Proposed Western Area Power Administration (WAPA) Project to Perform Security Upgrades at Tracy Substation Facility, Alameda County, California (16-SCAO-242)

Dear Ms. Leigh:

The Office of Historic Preservation (OHP) received on November 16, 2016 your letter initiating consultation and requesting expedited review for the above referenced undertaking under Section 106 of the NHPA, and its implementing regulations found at 36 CFR Part 800. Reclamation proposes to provide a letter of approval to WAPA for security upgrades at the Tracy Substation Facility which is located on Reclamation lands and is therefore requesting concurrence with its finding of no adverse effect to historic properties. Due to WAPA's need to begin construction on these important security upgrades an expedited review of this undertaking is requested. The following documentation was included with the submittal:

- *Figure 1: Project Location; Figure 2: Area of Potential Effects; Ground Photo of Work Location 1;*
- *California Department of Parks and Recreation DPR 523 form sets:*
  - ♦ *Primary Record: Tracy Pumping and Switch Stations (No.11): pgs. P1 to P8 (by: T. Bakic, PAR Environmental Services, Inc. Sacramento, CA) [October 04, 2001] [Primary # P-01-010441];*
  - ♦ *Building, Structure and Object Record: Tracy Pumping and Switch Stations (No.11): pgs. B1 to B2 (by: C. Baker, PAR Environmental Services, Inc. Sacramento, CA) [October 15, 2001];*
  - ♦ *List: Historic Properties within the East Altamont Energy Center Project [n.d.];*
  - ♦ *Primary Record: Tracy Pumping Station (No. 11a): pgs. P1 to P5 (by: T. Bakic, PAR Environmental Services, Inc. Sacramento, CA) [October 04, 2001] – [updated March 29, 2002] [Primary # P-01-010442];*
  - ♦ *Building, Structure and Object Record: Tracy Pumping Station (No. 11a): pgs. B1 to B2 (by: C. Baker, PAR Environmental Services, Inc. Sacramento, CA) [October 15, 2001] – [updated March 29, 2002];*
  - ♦ *Primary Record: Tracy Switch Station (No. 11b): pgs. P1 to P6 (by: T. Bakic, PAR Environmental Services, Inc. Sacramento, CA) [October 04, 2001] – [updated March 29, 2002] [Primary # P-01-010443];*
  - ♦ *Primary Record: Tracy Pumping Plant: pgs. 1 to 4 (by: R. Gerry, Peak & Associates, Inc., El Dorado Hills, CA) [March 15, 2002] – [updated May 01, 2003] [Primary # P-01-010442];*
  - ♦ *Primary Record: WAPA Tracy Switching Yard: pgs. 1 to 6 (by: R. Gerry and M. Peak, Peak & Associates, Inc., El Dorado Hills, CA) [March 15, 2002]-[updated May 01, 2003] [Primary # P-010443];*



- ♦ *Building, Structure and Object Record: Holck Ranch (No. 19): pg. B1 to B2 (by: C. Baker, PAR Environmental Services, Inc. Sacramento, CA) [October 15, 2001] [Primary # P-01-010443];*
- ♦ SHPO letter dated March 16, 2005 identifying the Tracy Switch Station (Yard) as not eligible for listing in the National Register of Historic Places (NRHP) and the Tracy Pumping Plant Station as eligible for NRHP listing under Criteria A and C.

Reclamation is limiting its review to proposed project upgrades that are partially or wholly on Reclamation lands and which includes retrofitting existing gates, installing card readers at two entrance locations into the substation, digging trenches for utility hookup from the card reader to the gates, and installing conduits from the base of the card reader to a new gate operator which will be mounted on the exterior of Reclamation's Control Building.

The Area of Potential Effects (APE) is located within a 1.36 acre area of the Tracy Substation Facility, near the WAPA Electrical Substation, and is within a very disturbed and industrial context. Maximum vertical APE for project activities is anticipated to be no more than 3-feet deep for running conduit and installing posts. Existing roads and parking areas will be used for access and any required staging. All work scope is located either on existing structures or within a highly disturbed context created by original 1950s (and later) grading and construction.

For historic properties identification efforts, Reclamation reviewed in-house files and previous field investigations at the locale. A full record search was conducted in 2008 and only minor alteration has occurred in the subsequent years so current conditions are similar. For the built environment survey, the Tracy Pumping Plant (now designated the Bill "C.W." Banks Pumping Plant [Pumping Plant]) and the Tracy Switchyard (Tracy Substation) were originally recorded in 2001 on one Department of Parks and Recreation (DPR) 523 form (*P-01-010441*). Eligibility evaluations are confusing in this DPR form, but it appears that all properties were originally recommended as not eligible for the NRHP. However, in a 2002 evaluation survey, the Tracy Pumping Plant (*P-01-010442*) was separated from the Tracy Switchyard (*P-01-010443*) and both were recorded on separate DPR 523 updated forms. The Pumping Plant record includes description of three existing buildings (one storage building and two office buildings, one of which is the Control Building), and the resource was evaluated as eligible under Criteria A and C for listing in the NRHP. It is unclear though, if the three auxiliary buildings are considered to be contributing components for the Pumping Plant. The Tracy Substation has been consistently evaluated as ineligible, which received SHPO concurrence in 2001.

In the enclosed 2005 OHP letter it is indicated that the Pumping Plant is assumed eligible under Criteria A and C but the three additional buildings are not mentioned. Therefore it is still not quite clear whether the three buildings were previously considered to be contributing or non-contributing components. Reclamation states that, in an effort to meet deadlines for WAPA, and for the purposes of this particular undertaking only, it will treat the Pumping Plant as eligible under Criterion A, as a component of the larger Central Valley Project, with the Control Building as a contributing component to the presumed eligible Pumping Plant.

All work scope will be accomplished entirely on existing buildings or in highly disturbed subsurface areas within the APE. Because of this, Reclamation considers that there is very

little potential to encounter sites that may be of religious and cultural significance to Indian tribes pursuant to the regulations at 36 CFR § 800.3(f)(2) and 36 CFR § 800.4(a)(4). Based on this conclusion, Reclamation did not consult with Indian tribes regarding this undertaking pursuant to 36 CFR § 800.2(c). Should future concerns arise, Reclamation will take appropriate steps to address them and make notifications as required.

Based on the above discussion and information provided in the enclosed documentation, Reclamation has reached a finding of no adverse effect to historic properties and invites comments on the APE, historic properties identification efforts, and requests concurrence with its finding of no adverse effect.

Following OHP staff review of the documentation, the following comments are offered.

- Pursuant to 36 CFR 800.4(a)(1), there are no objections to the APE as defined;
- Pursuant to 36 CFR 800.4(b), Reclamation has documented a reasonable and good faith effort to identify historic properties;
- Pursuant to 36 CFR 800.4(c)(1) and 800.4(c)(2), **I do not object** that the Tracy Pumping Plant and a contributing component, the Control Building, are treated as eligible to the NRHP under Criterion A for purposes of Section 106 on this particular undertaking only;
- Reclamation has determined that the proposed undertaking will result in no adverse effects to historic properties. Pursuant to 36 CFR 800.5(b), **I concur**.

Please 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 (as amended). Should you require further information, please contact Jeanette Schulz at [Jeanette.Schulz@parks.ca.gov](mailto:Jeanette.Schulz@parks.ca.gov) or (916) 445-7031.

Sincerely,



Julianne Polanco  
State Historic Preservation Officer