



## 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, B209  
P.O. Box 15830  
Sacramento, CA 95852-1830

Sacramento County Clerk/Recorder  
3636 American River Drive, Suite 110  
Sacramento, CA 95864

**Lead Agency:** Sacramento Municipal Utility District

**Project Title:** SMUD Transmission Line Steel Pole Recoating Project

**Project Applicant:** Sacramento Municipal Utility District, 6201 S Street, MS B209, Sacramento, CA 95817-1899

**Project Location:** The two proposed project locations are in the vicinity of 35th Street and 46<sup>th</sup> Street adjacent to the Sacramento Rapid Transit (RT), Sacramento, CA and south of Elder Creek Road, from east of Power Line Road to just east of Florin Perkins Road, Sacramento, CA

**Project Description:** SMUD is proposing to recoat fourteen transmission line painted steel poles with nominal operational line voltages of 115 and 230 kilovolt (kV) phase to phase, seven (7) 115kV poles in 2024 and seven (7) 230kV poles in 2025. The heights of the poles are between 95 and 125 feet. The poles were originally installed in the late 1970s and the paint to be removed contains lead/zinc. 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.

One transmission pole requires all existing coating of this pole to be fully removed. The entire pole shaft and the cross arms bracket mounting area will be enclosed with scaffolding, and all existing coating will be removed by blasting. For the initial refinishing of this pole, it will be necessary to remove all paint layers down to exposed steel to eliminate rust and ensure appropriate adhesion and life of the paint re-coating. All removed material will be captured with high efficiency particulate air (HEPA) filter-equipped vacuum attachments. The material will be tested and if found to be hazardous, disposed of in a Class I controlled landfill. The remaining poles will be recoated with brushes and/or rollers. All coating and overcoat applications shall be done according to the paint manufacturer's recommendations.

All work performed for the recoating will be done with the transmission lines de-energized. 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 Monday

through Friday. The fourteen poles are owned by SMUD and seven are located within the Sac RT right of way from 46th to 35th Streets, Sacramento, CA. The seven poles proposed to be recoated in 2025 are located south of Elder Creek Road and east of Power Line Road to just east of Florin Perkins Road, Sacramento, CA. The seven poles to be recoated in 2024 will occur in October over approximately 4 weeks, and the poles to be recoated in 2025 are anticipated to be of similar schedule and duration.

Cal/OSHA's Lead in Construction Standards (Title 8 CCR 1532.1) sets an action level (AL) of 30ug/m<sup>3</sup> and an 8-hour permissible exposure limit (PEL) of 50ug/m<sup>3</sup> for this type of activity and requires implementation of protective measures until air monitoring indicates that exposure is at or below the PEL. The painting contractors will comply with all environmental regulatory requirements by capturing lead dust generated during paint removal with HEPA-filtered vacuum attachments and employing Best Management Practices (BMPs) to control releases of lead into the surrounding environment. These measures consist of laying a plastic tarp at the base of each tower to collect paint scrapings and collecting and labeling the worker clothing sent to the laundry. All lead contaminated wastes will be collected, sealed, and transferred to an appropriate Treatment Storage and/or Disposal Facility (TSDF). The plastic sheeting will be placed around the base of the poles at a distance of 20 feet out from the base of the poles. 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)(2) & (4); CEQA Guidelines §15269(b)(c)(d))
- Categorical Exemption (CEQA PRC §21080(b)(9), 21084; CEQA Guidelines §15301(b), Existing Facilities)
- Statutory Exemptions

**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. SMUD has determined that the SMUD Transmission Line Steel Pole Recoating Project is exempt under CEQA Guidelines §15301, Class 1 Existing Facilities. CEQA Guidelines §15301, Class 1 Existing Facilities exemption applies to 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. Examples of this exemption include but are not limited to: (b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services. The SMUD Transmission Line Steel Pole Recoating Project involves maintenance of existing facilities, and therefore is considered exempt in accordance with CEQA Guidelines §15301(b).

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 pole recoating 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.

**Lead Agency Contact Person:**

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\_\_\_\_\_  
Signature

9/17/2024  
\_\_\_\_\_  
Date

Ammon Rice  
\_\_\_\_\_  
Printed Name

Sacramento Municipal Utility District  
\_\_\_\_\_  
Lead Agency

Signed by Lead Agency

Signed by Lead Applicant

Date Received for filing at OPR: \_\_\_\_\_