

EHP Concerns for Electrical Utilities

NEPA – Under the NEPA review, utilities usually pose no serious concerns. Projects that are repaired in kind are considered a STATEX. If there are some minor upgrades or changes, so long as they are not significant, there are a couple of CATEXs that would apply. EAs would be rare for this work and would be when significant alternations are proposed such as establishment of new utility corridors.

NHPA – There may be some archeological concerns if the work included relocating poles or establishing new routes and corridors. Relocation of a pole immediately adjacent or within a few feet generally doesn't cause much concern. If the relocation is several feet away or across a road, further review for potential archeological concerns would be required.

ESA – The biggest concern for electrical utilities and ESA is tree clearing operations and bats. The removal of fallen trees or limbs and branches to clear right of ways for access would not be considered tree clearing and little concern. The issue can become significant should non-hazardous trees be cleared or tree removal to widen or create right of ways. Should there be in water work, there may be ESA concerns for aquatic species.

Debris Disposal / hazardous materials – For the most part, poles are not a significant issue when it comes to disposal. Often, they will be left in place, donated to a local farmer/resident, or taken to a landfill. Since the poles are made with treated wood and materials, they would not be able to be chipped and donated similar to tree disposal nor could they be burned. The larger concern is for transformer disposal. They must be disposed of or recycled at facilities with the capabilities to handle the oils and chemicals properly. These facilities are spotted around the country so an applicant may provide information for somewhere in another state. There are some cases where the utility company will take the transformers back to their own facilities to be repaired or recycled. While unlikely, their may be older transformers that contain asbestos (pre 1985). If those are damaged or disposed of, special care and requirements are necessary to ensure proper disposal.

Information to be included in project worksheets

- Description of pole replacement to include if the pole was placed in the original spot or relocated.
- Relocated poles should include GPS of new location as well as proximity to previous location.
- Description of any vegetative clearing including description of type of vegetation cleared and when.
- Any disposal of materials and including where and any applicable permit information
- Description of any work that was outside of in kind repairs including any mitigation measures, changes in materials, or realignment of facilities