

CATEGORICAL EXCLUSION
SAFEGUARDS AND SECURITY ENHANCED ASSESSMENT SYSTEM
(PROJECT S-221)
HANFORD SITE, RICHLAND, WASHINGTON

PROPOSED ACTION

The U.S. Department of Energy (DOE) proposes to install six wooden utility poles to support the safeguards and security enhanced assessment system.

LOCATION OF ACTION

The locations of the proposed action are generally within and around 200 East Area of the Hanford Site. The specific locations cannot be disclosed due to their safeguards and security related nature, and the locations have been designated *Official Use Only*.

It is the policy of the DOE to make records available to the public to the greatest extent possible, in keeping with the spirit of the *Freedom of Information Act* (FOIA), while at the same time protecting sensitive information. The following FOIA exemption applies to Government information in accordance with 5 U.S.C. 552(b) and is germane to the proposed action addressed by this categorical exclusion:

“EXEMPTION 1: Classified secret matters or national defense or foreign policy.”

DESCRIPTION OF PROPOSED ACTION

The proposed action will install six wooden utility poles at various locations within and surrounding 200 East Area of the Hanford Site. Each pole will have a 50-foot diameter compacted gravel circle at its base for boom truck access on an as needed basis.

CATEGORICAL EXCLUSION TO BE APPLIED

The categorical exclusion listed in Title 10, Code of Federal Regulations (CFR) 1021, *National Environmental Policy Act Implementing Procedures*, Subpart D, Appendix B that will be applied to the proposed action described herein is B2.2. The authority for the regulation is 42 U.S.C. 7101 *et seq.*; 42 U.S.C. 4321 *et seq.*; and 50 U.S.C. 2401 *et seq.* The source for the regulation is 57 FR 15144, April 24, 1992, unless otherwise noted. Application of categorical exclusion B2.2 to the proposed action is discussed further in the section entitled, “*Eligibility Criteria*.”

B2.2 - "Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment)."

ELIGIBILITY CRITERIA

In applying categorical exclusions under the provisions of 10 CFR 1021.410(b) to specific proposed actions, DOE must determine that:

- (1) The proposal fits within a class of actions that is listed in Appendix A or B to Subpart D of 10 CFR 1021;
- (2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. Extraordinary circumstances are unique situations presented by specific proposals, such as scientific controversy about the environmental effects of the proposal; uncertain effects or effects involving unique or unknown risks; or unresolved conflicts concerning alternate uses of available resources within the meaning of section 102(2)(E) of NEPA; and
- (3) The proposal is not "connected" [40 CFR 1508.25(a)(1)] to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts [40 CFR 1508.25(a)(2)], and is not precluded by 40 CFR 1506.1 or §1021.211 of the regulation.

The proposed action fits within the class of actions described in 10 CFR 1021, Subpart D, Appendix B, categorical exclusion B2.2 and involves the *"installation of equipment and instrumentation for safeguards and security."* There are no extraordinary circumstances that may affect the significance of the environmental effects of the proposed action. Also, the proposed action is not connected to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

The proposed action fits within the class of actions listed in 10 CFR 1021, Subpart D, Appendix B, categorical exclusion B2.2, as discussed above. For classes of actions listed in Appendix B, the following conditions are integral elements to fit within the class that must be addressed:

| INTEGRAL ELEMENTS 10 CFR 1021, SUBPART D, APPENDIX B | |
|---|---|
| Would the Proposed Action: | Comment or Explanation: |
| Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders? | No. The proposed action will comply with laws, regulations, permits, health and safety, DOE, and other applicable requirements. The proposed action will install safeguards and security equipment that will contribute to the safety of Hanford Site personnel and property. |
| Require siting and construction or major expansion of waste storage, disposal, recovery or treatment facilities (including incinerators)? The proposal may include categorically excluded waste storage, disposal, recovery or treatment actions. | No. The proposed action will not require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities. |
| Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases? | No. The proposed action will not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products if they existed. There will be no uncontrolled or unpermitted releases. |
| <p>Adversely affect environmentally sensitive resources including, but not limited to:</p> <ul style="list-style-type: none"> (i) Property (e.g., sites, buildings, structures, objects) of historic, cultural, archaeological, or architectural significance designated by Federal, state, or local governments or property eligible for listing on the National Register of Historic Places; (ii) Federally-listed threatened or endangered species or their habitat (including critical habitat), Federally-proposed or candidate species or their habitat or state-listed endangered or threatened species or their habitat; (iii) Wetlands regulated under the Clean Water Act (33 U.S.C. 1344) and floodplains; (iv) Federally- and state-designated wilderness areas, national parks, national natural landmarks, wild and scenic rivers, state and Federal wildlife refuges, and marine sanctuaries; (v) Prime agricultural lands; (vi) Special sources of water (such as sole-source aquifers, wellhead protection areas, and other water sources that are vital in a region); (vii) Tundra, coral reefs, or rainforests? | <p>No. The proposed action will not adversely affect environmentally sensitive resources. The proposed action will be implemented in a manner that minimizes potential environmental impacts and in areas that receive cultural and ecological resources review and clearance with findings of "No Potential to Cause Effects."</p> <p>The property upon which the proposed action will occur is not of historic, cultural, archaeological, or architectural significance and is not eligible for listing on the National Register of Historic Places. This will be verified and documented through a cultural resources review with a finding of "No Potential to Cause Effects."</p> <p>Federally listed threatened or endangered species and their habitats will not be affected by the proposed action; including federally proposed or candidate species, state listed endangered or threatened species, and their habitat. This will be verified and documented through an ecological resources review with a finding of "No Potential to Cause Effects."</p> <p>There will be no impacts of the proposed action on wetlands or floodplains; federal/state designated wilderness areas, national parks, national landmarks, wild/scenic rivers, wildlife refuges, or marine sanctuaries; prime agricultural lands; special water sources; tundra, coral reefs, or rainforests. This will be verified and documented through an ecological resources review with a finding of "No Potential to Cause Effects."</p> |

CULTURAL AND ECOLOGICAL RESOURCES REVIEW

Cultural Resources Review

A cultural resources review of each location for the proposed action was conducted by the Hanford Cultural Resources Program in March 2010. The cultural resources review was conducted in accordance with 36 CFR 800, "*Protection of Historic Properties*," Subpart B, "*The Section 106 Process*," Section 800.3(a)(1), "*No Potential to Cause Effects*," of the Advisory Council on Historic Preservation implementing regulations for the *National Historic Preservation Act*.

The proposed action will be conducted in areas of the Hanford Site that have been previously surveyed or surveyed as a result of this proposed action. Aerial photographs confirmed some of the areas to be highly disturbed. Also, no known cultural resources are located near the proposed action sites. A field walk-down was completed for each proposed action site and no cultural resources were identified.

Based on the cultural resources review, a "*No Potential to Cause Effect*" finding was recommended and sent to the DOE Hanford Cultural Resources Program Manager. On March 22, 2010, the DOE Hanford Cultural Resources Program Manager responded and determined that in accordance with 36 CFR Part 800, Subpart B, Section 800.3(a)(1), the proposed action is not the type of undertaking with potential to cause effects to cultural and historic properties and no further actions are required. The cultural resources review and clearance is documented in NPCE #2010-200-009. A copy of the cultural resources review and clearance will be maintained by the Hanford Cultural Resources Program and also be placed in the proposed action project file for future reference, as needed.

An excavation permit will be obtained to support the proposed action. Workers will be directed to watch for cultural materials (e.g., bones, artifacts, etc.) during all work activities. If any cultural materials are encountered, then work in the vicinity of the discovery will stop until a qualified Hanford Cultural Resources Program specialist has been notified, assessed the significance of the find, and if necessary, arranged for mitigation of impacts to the find.

Ecological Resources Review

An ecological resources review of each location for the proposed action was conducted by the Ecological Monitoring and Compliance Project on November 16, 2009. The objectives of the ecological resources review were twofold. First, to determine the occurrence in the proposed action sites, of plant and animal species protected under the *Endangered Species Act* (ESA), candidates for such protection, and species listed as threatened, endangered, candidate, sensitive, or monitor by the State of Washington; and species protected under the *Migratory Bird Treaty Act* (MBTA). Second, to evaluate the potential impact of the proposed action on priority habitats and protected plant and animal species, identified in the ecological resources review.

Pedestrian and visual reconnaissance surveys of the proposed action sites were performed. It should be noted that the ecological resources review was conducted entirely outside the nesting

season of migratory birds (i.e., generally March through July). The results of the ecological resources review are documented in ECR #2010-200-008. A copy of the ecological resources review is maintained by the Ecological Monitoring and Compliance Project and a copy will be placed in the proposed action project file for future reference, as needed. The following summarizes the results of the ecological resources review:

- The EA-1 site is a gravel road edge at the top of a manmade hill supporting an environmental test site. The vegetation on the slope on the north side of the site is dominated by gray rabbitbrush (20% cover) and Sandberg's bluegrass (10%), both native species, and a planted cultivar of bluebunch wheatgrass (5%), also a native bunchgrass. No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-1 Alternate site is a previously disturbed road edge with vegetation dominated by Russian thistle (40%) and cheatgrass (10%), both alien annual weeds and Sandberg's bluegrass (10%). No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-2 site is on a spoils pile that has undergone natural regrowth. Vegetation is dominated by gray rabbitbrush (15%) and cheatgrass (30%). No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-3 site is a previously disturbed road edge with only sparse vegetation, primarily crested wheatgrass (a planted bunchgrass), Russian thistle, and Indian ricegrass (a native bunchgrass). No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-4 site is near an underground pipeline. The pipeline corridor is dominated by cheatgrass (25%) and crested wheatgrass (15%). Starting approximately 15 m east of the pipeline corridor, at the proposed pole site, is vegetation dominated by mature big sagebrush (15%, a native shrub), cheatgrass (25%), and Sandberg's bluegrass (10%). No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-5 site is on a spoils pile that has undergone natural regrowth. Vegetation consists of sagebrush (5%), cheatgrass (20%), Sandberg's bluegrass (10%), and Russian thistle (10%). Evidence of mule deer and coyote use was observed in the vicinity. No mammals or migratory birds or signs of their presence were observed in the vicinity.
- The EA-6 site is at the boundary of a previously disturbed underground pipeline corridor and a stand of mature shrub-steppe. The pipeline corridor is regularly treated with herbicide and is essentially devoid of vegetation. The site is dominated by sagebrush (25%) and cheatgrass (25%) along with Carey's balsam root (a native forb). Several California quail and coyote tracks were observed in the vicinity.

The following considerations and recommendations resulted from the ecological resources review of the proposed action sites:

- The black-tailed jackrabbit is listed as a Washington State Candidate Species, which is defined as a species for which the Washington Department of Fish and Wildlife has determined "*sufficient evidence suggests that its status may meet the listing criteria defined for State Endangered, Threatened, or Sensitive.*" Construction activities associated with the proposed action may cause jackrabbits to alter their travel and habitat use patterns, but are not expected to result in significant impacts to the population.
- The sage sparrow is listed as a Washington State Candidate Species. All birds noted in the survey, except the California quail, are protected under the MBTA, which makes it illegal to take, capture, or kill any migratory bird, or any part, nest, or egg of such bird. Workers should be instructed to watch for birds during project activities. If any nesting birds (if not a nest, a pair of birds of the same species or a single bird that will not leave the area when disturbed) are encountered, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed during work activities, then the Ecological Monitoring and Compliance Project should be contacted for further consultation.
- The mature sagebrush habitat at the proposed action sites has the potential to support shrub-nesting migratory birds such as sage sparrows, western meadowlarks, and lark sparrows. In order to avoid impacts to these bird species and assure compliance with the MBTA, it is recommended that any grubbing and shrub clearing tasks, especially for proposed action sites EA-4 and EA-6, be completed by March 15, 2010. The Ecological Monitoring and Compliance Project should be contacted for further consultation if grubbing and shrub clearing tasks occur after this date.
- Gravel substrates, such as that found along roadsides and in parking lots, provide potential nesting habitat for ground-nesting birds such as killdeer and horned lark. If any nesting birds or birds displaying defensive behaviors are encountered, then the Ecological Monitoring and Compliance Project should be contacted for further consultation.
- At proposed action sites EA-4 and EA-6, it is recommended that EA-6 be moved approximately 10 meters northwest to the edge of the shrubs to minimize disturbance to sagebrush. For the same reason, it is recommended that EA-6 be placed as close as possible to the existing roadway. The gravel pads at both sites should be kept as small as practicable.
- Ground-disturbing activities present the potential for soil erosion and the spread of noxious weeds. It is recommended that areas temporarily disturbed during proposed action construction activities (i.e., areas that will not be covered by gravel), be revegetated with native grass and forb species to control the spread of noxious weeds and

minimize soil erosion. The Ecological Monitoring and Compliance Project should be contacted for further consultation, as needed.

Assuming compliance with the above recommendations, no adverse impacts to protected species, priority habitats, or other biological resources of concern are expected to result from the proposed action. The Ecological Compliance Review is valid until September 30, 2010.

Potential Environmental Impacts Considered

The following checklist summarizes potential environmental impacts of the proposed action that were considered. Further explanations of "Yes" answers to questions are provided at the end of the checklist.

IMPACT TO AIR

| | Would the proposed action: | YES | NO |
|----|---|-----|----|
| 1. | Result in more than minor and temporary gaseous discharges to the environment? | | X |
| 2. | Release other than nominal and temporary particulates or drops to the atmosphere? | | X |
| 3. | Result in more than minor thermal discharges? | | X |
| 4. | Increase offsite radiation dose to >0.1 mrem (40 CFR 61 Subpart H)? | | X |

IMPACT TO WATER

| | Would the proposed action: | YES | NO |
|-----|--|-----|----|
| 5. | Discharge any liquids to the environment? | X | |
| 6. | Discharge heat to surface or subsurface water? | | X |
| 7. | Release soluble solids to natural waters? | | X |
| 8. | Provide Interconnection between aquifers? | | X |
| 9. | Require installation of wells? | | X |
| 10. | Require a Spill Prevention Countermeasure and Control Plan (40 CFR 112 and 761). | | X |
| 11. | Violate water quality standards (WAC 713-200, Table 1) | | X |

IMPACT TO LAND

| | Would the proposed action: | YES | NO |
|-----|---|-----|----|
| 12. | Conflict with existing zoning or land use? | | X |
| 13. | Involve hazardous, radioactive, PCB, or asbestos waste? | | X |
| 14. | Cause erosion? | X | |
| 15. | Require an excavation permit? | X | |
| 16. | Disturb an undeveloped area? | X | |

GENERAL

| | Would the proposed action: | YES | NO |
|-----|--|-----|----|
| 17. | Disturb Arid Lands Ecology or Wahluke Slope Reserves | | X |
| 18. | Cause other than a minor increase in noise level? | | X |
| 19. | Make a long-term commitment of large quantities of nonrenewable resources? | | X |
| 20. | Require new utilities or modifications to utilities? | X | |
| 21. | Use pesticides, carcinogens, or toxic chemicals? | | X |
| 22. | Require a radiation work permit? | | X |

The following are explanations for all "YES" responses in the potential environmental impacts considered above:

5. Discharge any liquids to the environment – The proposed action may discharge small volumes of water or other commercially available liquids for temporary dust control. The volume of such liquids is not expected to adversely affect the environment.

14. Cause erosion – The proposed action will involve ground disturbing activities that have the potential to cause erosion. However, disturbed areas will be covered with gravel or be revegetated with grass and forb species to minimize the potential for erosion.

15. Require an excavation permit – The proposed action will conduct ground disturbing activities. In accordance with Hanford Site procedures and protocols, ground disturbing activities of this nature require an excavation permit. Workers will be directed to watch for cultural materials (e.g., bones, artifacts, etc.) during all work activities. If any cultural materials are encountered, work in the vicinity of the discovery will stop until a qualified Hanford Cultural Resources Program specialist has been notified, assessed the significance of the find, and if necessary, arranged for mitigation of impacts to the find. Cultural and ecological resources reviews have been completed for each proposed action site with a finding of “No Potential to Cause Effect.”

16. Disturb an undeveloped area – The proposed action may be conducted in some undeveloped areas of the Hanford Site. Construction sites have been approved through the “Site Evaluation/Selection” process. Cultural and ecological resources reviews have been completed for each proposed action site with a finding of “No Potential to Cause Effect.”

20. Require new utilities or modifications to utilities – The proposed action may require the installation of new or modification to existing electrical utilities to provide power at each of the proposed action sites. However, power will be provided from nearby existing power poles that run along existing roadways. Cultural and ecological resources reviews have been completed for each proposed action site with a finding of “No Potential to Cause Effect.”

DETERMINATION

Based on my review of information conveyed to me and in my possession concerning the proposed action, as NEPA Compliance Officer authorized under DOE Order 451.1A, I have determined that the proposed action fits within the specified class of actions described in 10 CFR 1021, Subpart D, Appendix B, categorical exclusion B2.2; and satisfies the requirements of 10 CFR 1021.410(b). The proposed action is hereby categorically excluded from further NEPA review.



4-19-10

R. W. Russell III, NEPA Compliance Officer
Environmental Compliance Division
DOE-Office of River Protection

Date

cc:

J. W. Cammann S. H. Norton
J. M. Isdell
S. G. Martinez
M. Mills