

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: Keeler-Oregon City No. 2 and St. Johns-Keeler No. 2 (Bethany Lake) Realignment

PP&A No.: 2952

Project Manager: Williams, Amanda M - TEP-TPP-1

Location: Washington County, OR

Line Section	Township	Range	Section	County	State
Keeler-Oregon City No. 2	T1N	R2W	24	WASHINGTON	OR
St. Johns-Keeler No. 2		R1W	19		

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.6 Additions and modifications to transmission facilities

Description of the Proposed Action: BPA is proposing to remove and reconstruct approximately 2,400 linear feet of the Keeler-Oregon City No. 2 (KEEL-OREC-2) and the St. Johns-Keeler No. 2 (STJO-KEEL-2) transmission lines and associated fiber optic cable, partially relocating them to the south in the vacant Keeler-Pennwalt No. 1 (KEEL-PENN-1) transmission line right-of-way (ROW). The entire project is in a public park on land owned/managed by the Tualatin Hills Parks and Recreation District (THPRD).

A total of eight 2-pole wood structures would be removed; 5 structures from each of the alignments. Four 2-pole wood structures would be rebuilt as 3 pole dead end structures at their current locations requiring stabilizing guy wires and anchors. Two 2-pole wood structures and two 3-wood pole structures would be built at new locations in the vacated KEEL-PENN-1 transmission line ROW. New KEEL-OREC-2 structure (Str.) 2/5 and STJO-KEEL-2 Str. 9/3 would be rebuilt and include stabilizing guy wires and anchors.

To perform removal work, first the conductor and pole-mounted hardware must be disconnected and removed. Then the wood poles would be removed. At structure sites, poles would be removed by a utility boom truck with individual poles pulled directly out of the ground. The removed poles would be placed on a pole truck (log truck) by the boom truck, or temporarily placed on the ground near the work area and picked up by a self-loading pole truck.

Existing KEEL-OREC -2 Str. 2/5 and STJO-KEEL-2 Str. 9/4 currently are located on an earthen dike. So as not to destabilize the dike, these structures would be cut near the ground surface, and further cut into smaller pieces that may be removed using light weight equipment. Existing KEEL-OREC-2 Str. 2/6 is located in Bethany Lake approximately 10 feet from shore. Using a utility line bucket truck to allow crews to access the structure, poles would be bucked into smaller pieces and removed. Then to limit mobilization of sediments in the lake, the poles and stabilizing supports would be cut off approximately 6 inches below the sediment level and removed with a boom truck or crane.

At both new and rebuild structure sites, new pole holes would be augured with a utility bucket truck fitted with an auger. A backhoe would be used to excavate holes for new anchors. Excess soils would be captured and reused to backfill removed pole holes. Excess soils beyond the needs of the project would be captured and disposed of off-site.

By realigning the existing two transmission lines to the proposed location, public safety at Bethany Lake Park would be improved as well as access to the transmission line structures for maintenance and during an emergency.

Findings: In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Kevin George

Kevin George
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel
NEPA Compliance Officer

Date: June 5, 2017

Attachment(s): Environmental Checklist

Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

Proposed Action: Keeler-Oregon City #2 and St. Johns-Keeler #2 (Bethany Lake) Realignment

Project Site Description

The project is located in a public park on land either owned or managed by THPRD. BPA is proposing to remove and reconstruct approximately 2,400 linear feet of the Keeler-Oregon City No. 2 (KEEL-OREC-2) and the St. Johns-Keeler No. 2 (STJO-KEEL-2) transmission lines and associated fiber optic cable, partially relocating them to the south in the vacant Keeler-Pennwalt No. 1 (KEEL-PENN-1) transmission line right-of-way (ROW). A total of ten 2-pole wood structures would be removed; 5 structures from each of the alignments. A total of four 2-pole wood structures would be rebuilt as 3 pole dead end structures at their current locations requiring stabilizing guy wires and anchors. Two wood pole and two 3-wood pole structures would be built at new locations in the vacated KEEL-PENN-1 transmission line ROW. New KEEL-OREC-2 Str. 2/5 and STJO-KEEL-2 Str. 9/3 would be rebuilt with stabilizing guy wires and anchors. By realigning the existing two transmission lines to the proposed location, public safety at Bethany Lake Park would be improved as well as access to the transmission line structures for maintenance and during an emergency.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u></p> <p>Based on the results of a desktop analysis of the proposed undertaking which considered the nature of the proposed action, its location and setting, previous archaeological inventories conducted, and archaeological features recorded in the project area, as well as on-going consultations with OR SHPO discussing when Section 106 consultation is appropriate; BPA determined that this proposed undertaking has no potential to impact cultural resources.</p> <p>BPA prepared a report, <u>Cultural Resource Survey for the Bethany Lake Realignment Project, Washington County, Oregon</u> which was provided to the Confederated Tribes of the Grand Ronde and OR SHPO on February 7, 2017. No comments were received from the tribes, and on March 6, 2017, OR SHPO (SHPO No. 14-1658) concurred with this determination.</p> <p>In the event that archaeological or historical materials are discovered during project activities, work in the immediate vicinity must stop, the area would be secured, and the SHPO and the environmental project lead must be notified. Work would not commence again until the SHPO has cleared the area.</p>		
2. Geology and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

The project would require temporary ground-disturbing activities at structure removal/installation sites, guy anchor locations, routes of travel, and pulling/tensioning sites. A project Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented.

Excess soils would be captured and reused to backfill removed pole holes. Excess soils beyond the needs of the project would be captured and disposed of off-site.

Existing KEEL-OREC-2 Str. 2/5 and STJO-KEEL-2 Str. 9/4 currently are located on an earthen dike. So as not to destabilize the dike, these structures would be cut near the ground surface and further cut into smaller pieces and removed using light weight vehicles and/or equipment. Wood chips would be captured and removed from the site for disposal.

3. **Plants** (including federal/state special-status species)



Explanation:

It was determined that known populations of Willamette daisy, water howellia, Bradshaw's desert parsley, Kincaid's lupine, golden paintbrush, and Nelson's checker-mallow occur near the project area. The project area does not provide the required habitat conditions for the above-mentioned species. In addition, it was determined the project area is located several miles from the nearest Willamette daisy and Kincaid's lupine. For the above reasons, it was determined that this project would have "No-Effect" on these listed species or critical habitat.

4. **Wildlife** (including federal/state special-status species and habitats)



Explanation:

It was determined that known populations of marbled murrelet, Streaked horned lark, Yellow-billed cuckoo, Fender's blue butterfly, and northern spotted owl do not occur near the project area. The project area does not provide the required habitat conditions for the above-mentioned species.

Rock Creek provides Essential Fish Habitat (EFH) for Steelhead and coho salmon; however, no in-water work would be occurring in Rock Creek though several danger trees would be cut and lopped and scattered in the riparian area. BPA would implement a low-growing shade tree replanting plan that utilizes the planting of new shade trees and no longer managing existing tree species in the transmission line corridors.

It was also determined that the project area is located several miles from the nearest marbled murrelet, northern spotted owl, Streaked horned lark, and Fender's blue butterfly critical habitats. For the above reasons, it was determined that this project would have "No Effect" on these listed species or critical habitat.

The Migratory Bird Treaty Act (MBTA) extends protections to native song birds. Prior to the removal of trees and shrubs in the project area, a biologist would review the site and identify any occupied nests and flag them for avoidance. Tree and shrub removal would be scheduled to occur during the last half of the project outage when nesting bird species are anticipated to have fledged. By utilizing avoidance and timing restrictions, this project would have "No Effect" on species protected under MBTA.

5. **Water Bodies, Floodplains, and Fish** (including federal/state special-status species and ESUs)



Explanation:

Currently, the transmission KEEL-OREC-2, STJO-KEEL-2, and the vacant KEEL-PENN-1 line alignments pass over Rock Creek (Endangered Species Act (ESA) Stream), its riparian buffer, and the shoreline of Bethany Lake (aka Bethany Pond). Bethany Lake is isolated from Rock Creek and the riparian buffer by an earthen dam and concrete control structure at the lake's single outlet. Bethany Lake is a warm water lake which provides habitat for planted as well as indigenous warm water fish species.

Upper Willamette River DPS Steelhead has been identified as occupying Rock Creek. Rock Creek is also considered Essential Fish Habitat (EFH) for coho salmon. No in-water work would be occurring in Rock Creek though several danger trees would be cut and lopped and scattered in the riparian area. BPA would implement a

low-growing shade tree replanting plan that utilizes the planting of new shade trees and no longer managing existing tree species in the transmission line corridors.

Several tall-growing tree species (danger trees) would need to be removed from the currently vacant KEEL-PENN-1 ROW to allow for KEEL-OREC-2 and STJO-KEEL-2 alignments to be shifted to the south. All alignments pass over Rock Creek and its riparian buffer. To replace shade tree functions in the riparian buffer along Rock Creek, BPA has developed and would implement a tree replanting plan to replace tall-growing species with low-growing tree species in the vacant KEEL-PENN-1 ROW and in the riparian corridor along Rock Creek in the corridors being vacated.

Where rebuilt structures may be placed within 50 feet of the Rock Creek riparian buffer, poles would be fitted with plastic base wraps to limit the potential for vertical or horizontal leaching of wood-treating chemicals.

Existing KEEL-OREC-2 Str. 2/6 is located in Bethany Lake approximately 10 feet from shore. At the request of THPRD to limit the mobilization of sediments in the lake, wood poles and supporting stabilizing bars are to be cut off approximately 6 inches below the sediment level and removed. A floating boom/sediment curtain would be utilized to capture wood chips and contain disturbed sediments. Pole holes left in the sediment would be filled with clean soil.

At the request of Clean Water Services (CWS), BPA would cover construction stormwater management under BPA's statewide agency 1200-CA National Pollutant Discharge Elimination System (NPDES) permit. This permit requires BPA to develop and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would address hazardous materials management, erosion control Best Management Practices (BMPs), access requirements, site stabilization and restoration, and management of work within sensitive areas.

Through the use of the above-mentioned conservation measures, this project would have "No Effect" on steelhead or coho EFH.

6. **Wetlands**



Explanation:

Currently, the transmission KEEL-OREC-2, STJO-KEEL-2, and the vacant KEEL-PENN-1 line alignments pass over Rock Creek (ESA) Stream) and its riparian buffer. Several tall-growing (danger trees) would need to be removed from the riparian areas in the vacant KEEL-PENN-1 ROW to allow for KEEL-OREC-2 and STJO-KEEL-2 alignments to be shifted to the south. BPA has developed and would implement a low-growing shade tree replanting plan to replace tall-growing species with low-growing tree species in the vacant KEEL-PENN-1 ROW and in the riparian corridor along Rock Creek in the corridors being vacated.

As noted in the 2016 Biological Opinion (BiOp), the BPA Transmission System Vegetation Management Program Final Environmental Impact Statement/Record of Decision (BPA 2000) guides BPA's vegetation management for transmission line ROWs. At this site, trees would be cut by hand and limbs and tree trunks would be cut into smaller pieces to "lop and scatter" in the ROW. At all locations, tree stumps and roots would remain to naturally degrade over time to limit erosion. No herbicide treatments would be applied to stems to prevent regrowth initially, and would be monitored for treatment in the future if necessary. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar) using chemicals and methods listed in the BiOp proposed design criteria #37.

7. **Groundwater and Aquifers**



Explanation:

Project would not result in any groundwater withdrawals nor provide a pathway for groundwater contamination.

8. **Land Use and Specially Designated Areas**



Explanation:

This project takes place in Bethany Lake Park which is owned and/or managed by THPRD. The park consists of: Bethany Lake, maintained grass greenspace, community garden, graveled parking area, asphalt pedestrian trail,

Rock Creek, and its adjacent riparian buffers. The southern portion of the park has a 380-foot wide transmission line easement which is shared by BPA and Portland General Electric (PGE). BPA's easement consists of the existing KEEL-OREC-2 and STJO-KEEL-2, and vacated KEEL-PENN-1 alignments.

Construction work for this project would take place under an electrical outage. The outage for this project is scheduled to begin August 21, 2017, and end September 10, 2017. For the protection of the public access to the pedestrian grassed greenspace, Bethany Lake walking trail and shoreline, and a portion of the graveled parking area, would be temporarily restricted during construction hours. The community garden would remain open, with the exception of the several hours on each of four days when new conductor or fiber optic cable would be pulled in and secured.

After September 10, all areas of the park would once again be available for public usage with the exception of small sections of the Bethany Lake shoreline and Rock Creek riparian area walking path. These areas may experience temporary closures for replanting crews to stage materials for planting.

9. Visual Quality



Explanation:

Currently, the 380-foot wide transmission line ROW is shared by PGE and BPA's vacated KEEL-PENN-1, existing STJO-KEEL-2 and KEEL-OREC-2 transmission line alignments. Under the proposed realignment, the KEEL-OREC-2 and STJO-KEEL-2 transmission lines would be shifted to the south into the vacant KEEL-PENN-1 transmission line alignments.

The alignment would use fewer, but taller structures. The angle structures being rebuilt as 3-pole dead end structures requiring guy wires and anchors. Existing wood pole structures range in height from 50 feet to 70 feet and the new/rebuilt wood pole structures would range in height from 60 feet to 100 feet tall. New conductor, insulators, and fiber optic cable would be similar in appearance and color.

The existing KEEL-OREC-2 Strs. 2/5, 2/6, 2/7 and STJO-KEEL-2 Strs. 9/4, 9/3, and 9/2 would be removed from along/in Bethany Lake and its shoreline. Rebuilt/renumbered KEEL-OREC-2 Strs. 2/5, 2/6 and STJO-KEEL-2 9/3 and 9/2 would be rebuilt to the south within the vacant KEEL-PENN-1 alignment overlying the Bethany Lake Park greenspace. Both KEEL-OREC-2 Str. 2/5 and STJO-KEEL-2 Str. 9/3 would be rebuilt as 3-pole dead end structures requiring guy wires and anchors.

On the western end of the project, rebuilt KEEL-OREC-2 Str. 2/4 and rebuilt/renumbered STJO-KEEL-2 Str. 9/4 would be located approximately 10 feet west of the current 2-pole structure locations, and would be rebuilt as 3-pole dead end structures requiring guy wires and anchors. On the eastern end of the project, rebuilt/renumbered KEEL-OREC-2 Str. 2/7 and rebuilt STJO-KEEL-2 Str. 9/1 are currently 3-pole dead end structures with guy wires and anchors and would be rebuilt in similar configuration at their current location.

All guy wires would be marked with high visibility plastic tubes or ribbon to make them more visible to park uses.

Within the Rock Creek riparian area, tall-growing trees would be removed from the vacant KEEL-PENN-1 alignment, and new trees would be planted in the KEEL-OREC-2 and STJO-KEEL-2 alignments which are being vacated. Additionally, new trees and shrubs would be planted along the southern shoreline of Bethany Lake and the Rock Creek riparian area. With the removal of structures in the KEEL-OREC-2 and STJO-KEEL-2 alignments, approximately 1,300 feet of shoreline would no longer be managed by BPA to remove tall-growing trees, allowing new and existing trees and shrubs to reach their full height and provide additional shade and shoreline erosion protection.

10. Air Quality



Explanation:

A small increase in vehicle emissions during the project is anticipated; however, being located along NW 185th Avenue which has constant flow of large truck and small vehicles, the increase above normal background usage would be nominal. A small amount of dust during construction may be observed. This would be mitigated by

implementing dust management BMPs to include the use of water as a dust suppressant and sweeping dust from asphalt roads.

11. **Noise**



Explanation:

Temporary construction noise would be anticipated during daylight hours. Operational noise would not change.

12. **Human Health and Safety**



Explanation:

Throughout the spring and summer months, Oregon Department of Fish and Wildlife (ODFW) stocks Bethany Lake with trout. Multiple angler shoreline casts have become entangled in the overhead conductors, which presents the potential for electrocution. By realigning the existing two transmission lines to the proposed location, human health and safety at Bethany Lake Park would be improved as well as access to the transmission line structures for maintenance and during an emergency. No changes to electric and magnetic fields would result from the project.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- ☒ Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation, if necessary:

- ☒ Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- ☒ 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.

Explanation, if necessary:

- ☒ Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary:

Landowner Notification, Involvement, or Coordination

Description: BPA has coordinated with the THPRD regarding construction methods, sensitive locations and replanting/stabilization needs, and park access and timing restrictions. BPA sent project information letters to landholders within 1/4 mile of the project area and held a public meeting on May 22, 2017, to discuss the proposed project. Six interested parties attended the public meeting and six phone calls were received by public affairs and/or the project manager. Project notices would be posted at the park information kiosk beginning in June. During construction, BPA would cordon off work areas with orange safety fencing and cover open excavations prior to leaving the work site in the evening. Traffic control and flaggers shall be utilized when work is taking place over NW 185th Avenue.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts on any environmentally sensitive resources.

Signed: /s/ Kevin George

Kevin George – EPI-4

Environmental Protection Specialist

Date: June 5, 2017