

**CATEGORICAL EXCLUSION FOR TRIBAL MITIGATION  
AND RELATED ACTIVITIES,  
PACIFIC NORTHWEST NATIONAL LABORATORY,  
RICHLAND, WASHINGTON**

**Proposed Action**

The U.S. Department of Energy (DOE), in cooperation with three Native American Tribes, proposes to perform native vegetation enhancement activities on lands currently managed by the DOE Pacific Northwest Site Office (PNSO) as part of the Pacific Northwest National Laboratory (PNNL) Richland campus using funding provided by the DOE Richland Operations Office (DOE-RL), for the purpose of enhancing culturally significant biological resources.

**Background**

In September 2015, DOE-RL completed the conveyance of approximately 1641 acres on the Hanford Site to the Tri-City Development Council for the purpose of economic development, pursuant to Section 3013 of the National Defense Authorization Act of 2015 (Public Law 113-291). DOE-RL prepared an Environmental Assessment (DOE/EA-1915) for this land conveyance, and concurrently completed the required review to comply with Section 106 of the National Historic Preservation Act (NHPA). Because the land conveyance would adversely affect cultural resources and traditional cultural properties, a Memorandum of Agreement (MOA) was developed. Signatories on included DOE-RL, the Washington State Department of Archaeology and Historic Preservation (DAHP), The Advisory Council on Historic Preservation, the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Nez Perce Tribe, and the Wanapum. The MOA was included as Appendix K in DOE/EA-1915.

As part of the mitigation actions stipulated in the MOA, DOE-RL agreed to develop and implement, in consultation with the CTUIR, Nez Perce Tribe, and Wanapum, native revegetation plans on DOE lands outside, but near, the 1641-acre conveyed lands. These actions are intended to enhance the quantity and quality of biological resources that are culturally significant to the affected Tribes.

**Location of Action**

The proposed actions would occur within a portion of the PNNL Richland Campus north of Richland, Washington, that has been set aside for the preservation of sensitive cultural resources. This area, referred to as the Preservation Designated Area (PDA), is located in the northeast portion of the PNNL Richland Campus, generally between the Columbia River to the east, George Washington Way Extension to the west, Horn Rapids Road to the south and an area formerly part of the Hanford 300 Area to the north (Figure 1 attached). The NPT, CTUIR, and Wanapum would work separately in conterminous work areas; the outline of the combined work area is shown in Figures 2 and 3 (attached).

## **Description of the Proposed Action**

The goal is to improve native plant communities and reduce the presence of non-native and noxious plants. Tribal revegetation activities may include seed collection, planting of native plants grown in nurseries or transplanted from other areas of the Hanford Site, soil analysis, and noxious weed control. Methods for revegetation would be outlined by each consulting Tribe and may include both manual and mechanical means, as appropriate. Sampling for soil analysis would be conducted by hand and may include soil sifting and acquisition of 1-inch by 2-inch soil cores.

Additional tribal activities may include field surveys, rehabilitation such as decompaction activities (including raking and loosening of compacted gravel or soil), site preparation (including litter and debris removal or other similar activities), seasonal placement of items or materials on the surface (shades, screens, etc.), enhancement of previously established native plant communities, and noxious weed control. Some planting activity locations may require minor mechanical recontouring prior to revegetation so that the revegetated areas blend with the adjacent natural landscape. Additional soils may be placed by hand or equipment, as appropriate, to match the surrounding natural landscape.

Access to the project area would be through an existing submarine compartment transport road and other existing dirt roads and trails. These areas may also be used as temporary staging areas during project activities.

Additional actions that may be performed to protect and enhance the cultural and biological resources within the project area and vicinity include removal of a set of abandoned power poles, conductors, and associated equipment from within the PDA, and relocation of the fence on the southern boundary of the PDA to be adjacent to the existing utility easement on the north side of Horn Rapids Road.

## **Biological and Cultural Resources**

A biological resources review was prepared by PNNL (2018-PNSO-017), based on data collected within the PDA between 2011 and 2017, and by biologists from the DOE-RL site integration contractor in December 2017. There are no species listed as endangered or threatened by either Washington State or the US Fish and Wildlife Service. There are no habitat types that are considered rare or of priority for conservation; most of the work areas consist of mid-successional habitats dominated by cheatgrass (*Bromus tectorum*), Sandberg's bluegrass (*Poa secunda*), and gray rabbitbrush (*Ericameria nauseosa*).

A cultural resource review (HCRC# 2017-300-005) was prepared by DOE-RL and was reviewed by the Tribes and DAHP in compliance with Section 106 of the NHPA. The revegetation activities would take place within a culturally sensitive area. As a result, routine tasks may need to be adjusted to avoid or minimize ground disturbance that would adversely affect historic properties. Work conditions may include full-time monitoring during ground-disturbing activities by Tribes and/or DOE-RL archaeologists, limiting work to hand tools in sensitive locations, and defining and flagging work areas, access routes, and staging areas. Mandatory cultural sensitivity awareness training would be provided to any contractors working onsite.

PNSO maintains the *Pacific Northwest Site Office Cultural and Biological Resources Management Plan* (PNSO-PLAN-09 Rev 3, November 2015). The proposed action is consistent

with the goals of this management plan.

### **Categorical Exclusion to Be Applied**

Because the proposed action is to improve natural vegetation and wildlife habitat and other actions to protect or enhance cultural resources, the following categorical exclusion (CX), as listed in the DOE National Environmental Policy Act (NEPA) implementing procedures, 10 CFR 1021, would apply:

*B1.20 Protection of cultural resources, fish and wildlife habitat.* Small-scale activities undertaken to protect cultural resources (such as fencing, labeling, and flagging) or to protect, restore, or improve fish and wildlife habitat, fish passage facilities (such as fish ladders and minor diversion channels), or fisheries. Such activities would be conducted in accordance with an existing natural or cultural resource plan, if any.

### **Eligibility Criteria**

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed in the table below.

<b>Integral Elements, 10 CFR 1021, Subpart D, Appendix B (1)-(5)</b>	
<b>Would the Proposed Action:</b>	<b>Evaluation:</b>
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or Executive Orders.
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. No hazardous or radiological waste is expected to be produced during the proposed activities. If a waste is generated it would be managed in accordance with applicable regulations and waste disposal pathways would be identified prior to generating waste and waste generation would be minimized.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that results in uncontrolled or unpermitted releases. The potential for the presence of hazardous substances was considered at the time the property was reassigned from DOE-RL to PNSO and no record or indication of hazardous substances was found.

<b>Integral Elements, 10 CFR 1021, Subpart D, Appendix B (1)-(5)</b>	
<b>Would the Proposed Action:</b>	<b>Evaluation:</b>
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms or synthetic biology. Included in the proposed action are activities intended to reduce or eliminate governmentally designated noxious weeds. Any plant species introduced to the project area would be native to the region and derived from locally collected seed or stock.
Have the potential to cause significant impacts on environmentally sensitive resources., including, but not limited, to: <ul style="list-style-type: none"> <li>• protected historic/archaeological resources</li> <li>• protected biological resources and habitat</li> <li>• jurisdictional wetlands, 100-year floodplains</li> <li>• Federal- or state-designated parks and wildlife refuges, wilderness areas; wild and scenic rivers; national monuments; marine sanctuaries; national natural landmarks; and scenic areas.</li> </ul>	<p>No environmentally sensitive resources would be adversely affected by the proposed actions.</p> <p>Although the proposed actions would occur on an area with known historic/archaeological resources. The project activities do not have the potential to cause significant impacts to those resources. Additionally, the activities will be planned to specifically avoid causing impacts to those resources.</p> <p>The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments, or other specially designated areas, prime agricultural lands, or special sources of water.</p> <p>Potential impacts on biological or cultural resources are described above.</p>

### Summary of Environmental Impacts

The following table summarizes environmental impacts considered when preparing this CX determination.

<b>Environmental Impacts Considered when Preparing this CX Determination</b>	
<b>Would the Proposed Action:</b>	<b>Evaluation</b>
Result in more than minimal air impacts?	Some activities, especially those using mechanical equipment may cause minor and temporary dust impacts. This would be controlled using normal best management practices for dust control in construction areas. Mechanical equipment may release small amounts of exhaust from gasoline or diesel combustion. These impacts are expected to be minimal.
Increase offsite radiation dose measurably?	The proposed action would not release any radiation or radiological contaminants and would therefore result in no effect on offsite radiation dose.
Require a radiological work permit?	The proposed work would not require a radiological work permit.

<b>Environmental Impacts Considered when Preparing this CX Determination</b>	
<b>Would the Proposed Action:</b>	<b>Evaluation</b>
Discharge any liquids to the environment?	Some water may be applied to some or all of the work areas for dust control or short-term irrigation.
Require a Spill Prevention, Control, and Countermeasures plan?	The proposed work would not require a Spill Prevention, Control, and Countermeasures plan.
Use carcinogens, hazardous, or toxic chemicals/materials?	The proposed work might include the use of herbicides to control noxious weeds or cheatgrass. These chemicals would be applied under supervision of licensed pesticide applicators following specific label requirements for each herbicide.
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	The proposed action would not involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste.
Cause more than a minor or temporary increase in noise level?	Mechanical equipment may cause a small increase in ambient noise levels. However, these impacts would be temporary, all work would be conducted during day working hours, and the project sites are located nearly one-half mile from the nearest residence.
Create light/glare, or other aesthetic impacts?	The proposed action is not likely to create light, glare, or aesthetic impacts.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	Some of the proposed activities, especially those conducted with mechanical equipment may require an excavation permit.
Disturb an undeveloped area?	The project area was used for agriculture and livestock grazing prior to the development of the Hanford Site in 1943. Portions of the PDA were disturbed in the 1990s when it was the originally intended site of the Environmental and Molecular Sciences Laboratory, but the proposed tribal work areas have been essentially undisturbed since at least the early 1940s. The proposed action would create some surface disturbance, but this would be followed by activities specifically designed to restore the native habitat—which is the intent and purpose of the proposed action.
Result in more than minimal impacts on transportation or public services?	The proposed action would not affect transportation or public services.
Disproportionately impact low-income or minority populations?	The proposed action would not disproportionately impact low-income or minority populations.
Require environmental or other permits from federal, state, or local agencies?	No permits from federal, state, or local agencies are needed to complete the proposed action.

### Compliance Action

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me by DOE Order 451.1 B, Change 3, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

Signature:  \_\_\_\_\_ Date: 3-21-2018

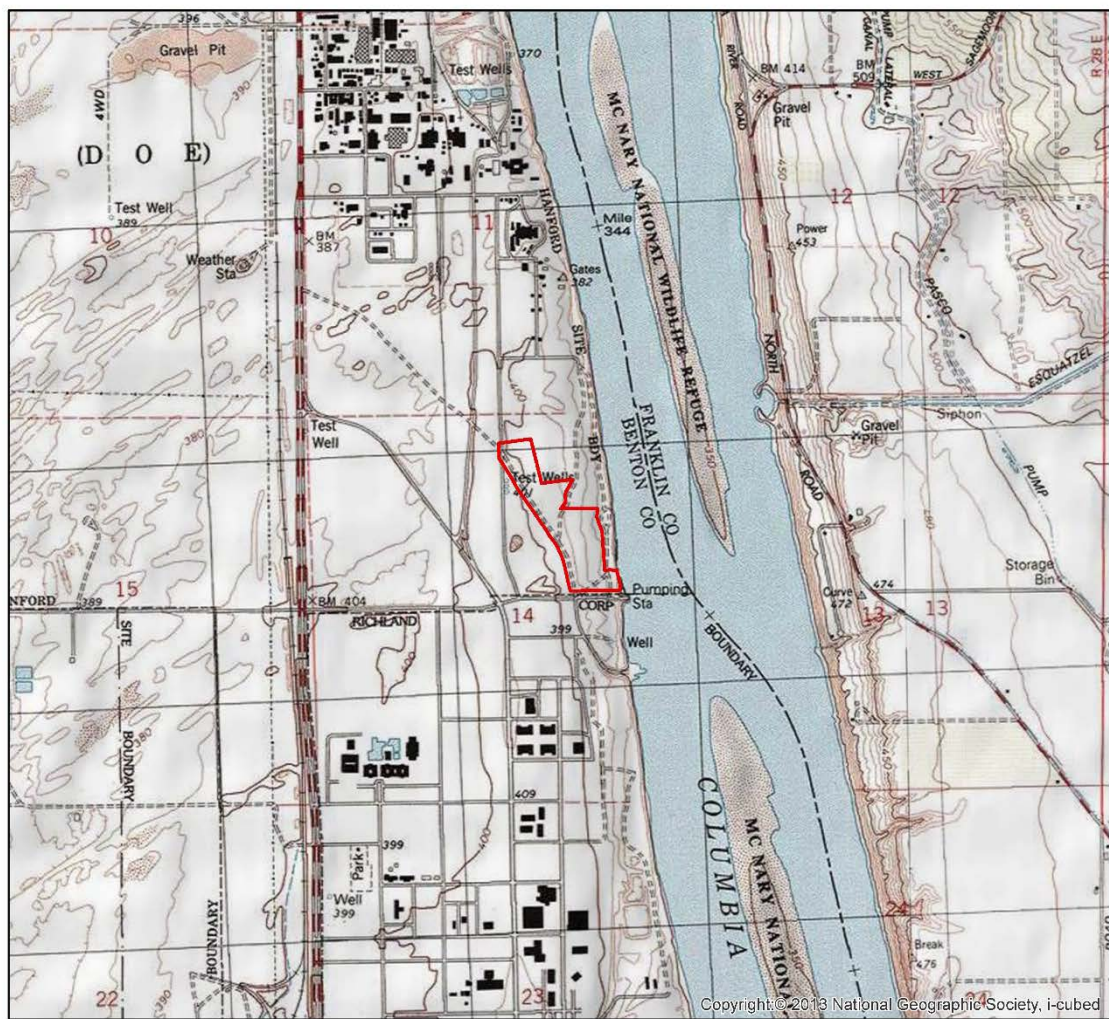
Tom McDermott, PNSO NEPA Compliance Officer

cc: MR Sackschewsky, PNNL



**Figure 1.** Location of the Preservation Designated Area within the PNNL Richland Campus.



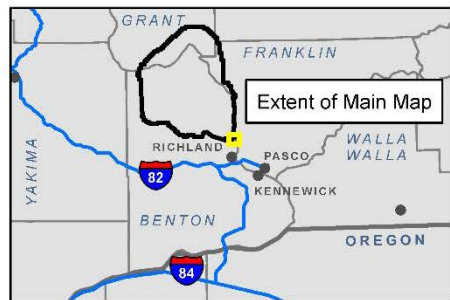


#### LEGEND

Area of Potential Effect (APE)

Richland, WA 7.5' USGS Quad  
Township 10 N Range 28 E  
Section 14

0 0.125 0.25 0.5 0.75 1 Miles



#### Area of Potential Effect (APE)

HCRC#2017-300-005 | ECR-2017-308  
Hanford Site, Benton County, Washington

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**Figure 2.** USGS 1:24,000 quad map indicating Project Area





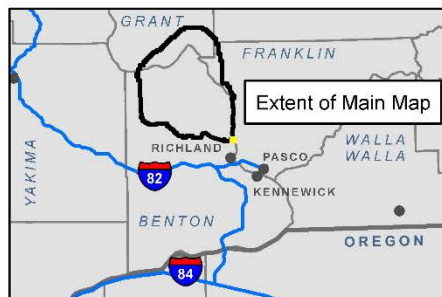
#### LEGEND

Area of Potential Effect (APE)

Richland, WA 7.5' USGS Quad  
Township 10 N Range 28 E  
Section 14

NOTE: Aerial Imagery, 2015, NAIP.

0 37.5 75 150 225 300 Meters



#### Detail of Area of Potential Effect (APE)

HCRC#2017-300-005 | ECR-2017-308  
Hanford Site, Benton County, Washington

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**Figure 3.** Detail of Project Area on aerial imagery.