## NEPA REVIEW SCREENING FORM for Actions Included in CXs

DOE/CX-00150

#### I. Project Title:

Activity Specific Categorical Exclusion for New Hanford Site Boundary Fencing, Signage, and Gates

II. Describe the proposed action, including: location, time period over which proposed action will occur, project dimension (e.g., acres displaced/disturbed, excavation length/depth), area/location/number of buildings. Attach maps and drawings, as applicable. Describe existing environmental conditions and potential for environmental impacts from the proposed action. If the proposed action is not a project, describe the action or plan.

#### 1.0 BACKGROUND

Title 10, Part 1021 of the Code of Federal Regulations (10 CFR 1021), "National Environmental Policy Act Implementing Procedures," establishes procedures that the U.S. Department of Energy (DOE) uses to comply with section 102(2) of the National Environmental Policy Act (NEPA) of 1969 [42 U.S.C. 4332(2)] and the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (40 CFR Parts 1500-1508).

10 CFR 1021.410, "Application of Categorical Exclusions," discusses classes of actions that normally do not require Environmental Assessments (EAs) or Environmental Impact Statements (EISs). 10 CFR 1021, Subpart D, Appendices A and B list classes of actions that DOE has determined do not individually or cumulatively have significant effects on the human environment and are categorically excluded from the preparation of EAs or EISs. To conclude that a proposed action is categorically excluded, DOE must determine that the requirements of 10 CFR 1021.410 and the conditions that are "integral elements" as defined in 10 CFR 1021, Subpart D, Appendix B, are met.

#### 2.0 PROPOSED ACTION

The DOE, Richland Operations Office (RL), Site Stewardship Division proposes to install fencing, signage, and gates along the new Hanford Site boundary (referred to hereafter as the project area) resulting from the 2015 conveyance of 1,641 acres of formerly DOE-controlled land to the Tri-City Economic Development Council (see Figure 1). Sections of fencing and signage currently exist. Other sections are fenced, but there is no signage. Some sections require new fencing and signage. Table 1 summarizes fencing, signage, and gate requirements in the project area. T-posts and single strand barbless wire fencing would be installed where there is currently no fencing; including 16,357-feet around Borrow Pit 6; 5,450-feet at the Horn Rapids Landfill; and a 3,700-feet section at the southeastern boundary of the Hanford Patrol Training Academy.

A firebreak would be established along the inside of the Hanford Site boundary fencing in accordance with Hanford Fire Department "best management practices" involving two passes of a 16-feet wide disk (roughly 30-feet total width with overlap of passes) to contain slowly moving ground fires. The project area is predominantly vegetated with Cheatgrass, a winter annual species. Disking is preferred over plowing or blading because it chops and incorporates vegetative matter into the soil providing effective erosion control. All project vehicles and heavy equipment would be confined to the Area of Potential Effect (APE) from the National Historic Preservation Act Section 106 process.

Six (6) steel access gates would be installed where new fencing crosses existing roads (see Figure 1). Each gate would measure approximately 14-feet wide and 4-feet tall. A post-hole measuring approximately 2.5-feet deep and 1-foot wide would be excavated on each end of the gates. Round steel gate posts would be placed in these holes and secured with concrete (see Figure 2). Hanford "No Trespassing" and "Private Property" signs would be mounted on the fencing and gates, as necessary (some fencing and signage currently exist), at 500-feet increments.

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3.0 AFFECTED ENVIRONMENT AND OTHER CONSIDERATIONS

3.1 RCRA Permit and Fencing Requirements

The Hanford Site Resource Conservation and Recovery Act (RCRA) Permit (WA7890008967, Revision 8c) Attachment 3, "Security," describes the security measures, equipment, and warning signs used to control entry to the Hanford Site. Signs are posted along Hanford Site boundaries stating "No Trespassing." Perimeter fences, restrictive signage, and random protective force patrols are used to control access to the Hanford Site. The Hanford Site security systems are also in place to satisfy requirements of WAC 173-303-310(2)(c), "Artificial or Natural Barriers." The proposed action would be consistent with Hanford Site security requirements.

3.2 Fencing Effects on Wildlife

Improper fencing can impede wildlife access to critical resources (e.g., water, forage, fawning grounds, and cover) and restrict escape or migratory routes essential to the well-being of individuals and populations. T-posts and single strand barbless wire fencing installed 36 to 42 inches above ground level would be used in the project area. This type of fencing is prescribed by Mission Support Alliance Ecological Monitoring and Environmental Surveillance as a "best management practice" along Hanford Site boundaries to prevent or reduce adverse impacts on wildlife access to critical resources and escape or migratory routes.

3.3 Soils

Soils identified within the project area include Rupert sand, Ephrata sandy loam, and Burbank loamy sand associated with Quincy sand (DOE/EA-1915). The sandy nature of soils contributes to high permeability, with most or all precipitation and snow melt infiltrating into the soil column before generating any surface runoff. The potential for water erosion is low. While sandy soils can be susceptible to wind erosion if disturbed or left vegetation-free, wind erosion of firebreaks established by disking would be insignificant as discussed in Section 2.0.

3.4 Surface Water

The project area and adjacent areas do not have perennial surface waters, streams, or ponds; and no wetlands have been identified (DOE/EA-1915). The nearest perennial surface water is the Columbia River, approximately 0.5 miles to the east. Localized areas could have a limited amount of standing surface water after a heavy precipitation or rapid snow melt on frozen ground. These surface waters may flow limited distances before infiltrating into the highly permeable sandy soils (see Section 3.3) found in the project area. The single strand barbless wire fencing would not affect surface water flow in the project area.

3.5 Ecological Resources (ECR-2016-628)

Mission Support Alliance (MSA) Environmental Compliance staff performed surveys of the project area on November 9, 18, 30, and December 1, 2016, and March 2, 2017. Major wildfires burned through the project area in 1974, 1984 and 2000 removing much of the shrub cover. While other plant species exist, the major vegetation community type is Sandberg's bluegrass from post-fire revegetation and Cheatgrass from invasion. Wildlife

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observations during the surveys were mostly common species.

Although no plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by Washington State as threatened or endangered were observed in the vicinity of the project area during the surveys, several sensitive habitats or species occur in or near the project area. The following are requirements to mitigate potential impacts to ecological resources:

1. Mission Support Alliance Real Estate Services (MSA-RES) will direct project personnel during pre-job meetings to keep vehicles on existing roads and travel corridors, or new corridors established when new fencing is installed to avoid damaging native vegetation.

2. MSA-RES will direct project personnel during pre-job meetings to keep vehicles on existing roads when feasible and avoid damaging newly planted areas near Borrow Pit 6 to the greatest extent possible.

3. MSA-RES will direct project personnel during pre-job meetings to keep vehicles on existing roads when feasible and avoid damaging vegetation to the greatest extent possible along the southeastern edge of the project area. This area contains unusual assemblages of plant species classified by the Washington National Heritage Program (WNHP) as "Review Group 1." These plant species are Level 3 resources in the Hanford Site Biological Resources Management Plan (BRMP).

4. MSA-RES will direct project personnel during pre-job meetings to avoid two small groves of trees in the southern portion of the project area during the Swainson's hawks nesting season (April through mid-August) and limit the flushing of parents from the nest to less than 30 minutes every 4 hours.

Birds could nest within the project area. The nesting season at Hanford is typically from mid-March to mid-July (with the exception of the Swainson's hawk as previously discussed). The active nests of migratory birds are protected by the Migratory Bird Treaty Act (MBTA) of 1918. MSA-RES will direct project personnel during pre-job meetings to watch for nesting birds. 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 suspected, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed within the project area, then project personnel will contact MSA Ecological Monitoring and Environmental Surveillance at (509) 376-5448 to evaluate the situation.

No adverse ecological resource impacts are anticipated from the proposed action if these requirements are followed. If there are any changes in the scope of the proposed action that could result in disturbances outside the project area description, then additional ecological review would be required.

3.6 Cultural Resources (HCRC# 2016-600-015)

A Cultural Resources Review of the proposed action was conducted by MSA Cultural and Historic Resources. An Area of Potential Effect (APE) notification was sent to the Washington State Historic Preservation Office (SHPO) and regional Tribes on September 28, 2016 (see Figure 3). A cultural resources survey was conducted on October 20, 2016. Cultural materials observed during the archaeological survey were recorded and data was compiled into six new Washington State Archaeological Inventory forms and one updated form.

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A Cultural Resources Review (CRR), with a finding of No Adverse Effects to Historic Properties, was prepared and submitted to the SHPO and Area Tribes for a 30 day comment period on May 11, 2017. The SHPO concurred with the findings of the CRR on May 15, 2017. DOE-RL provided a notice of compliance with Section 106 of the National Historic Preservation Act for the proposed action on June 19, 2017.

Although no impacts to cultural resources are anticipated, MSA-RES will direct project personnel during pre-job meetings to limit off-road driving to previously or newly established access routes and watch for cultural materials (e.g., bones, stone tools, mussel shell, cans, and bottles) during all work activities. If any cultural materials are encountered, then work in the vicinity of the discovery will stop until a MSA Cultural and Historic Resources Archaeologist has been notified at (509) 376-5741, the significance of the find assessed, appropriate Tribes notified, and if necessary, arrangements made for mitigation of the find.

If there are changes in the scope of activities that could result in disturbances outside the project area description or APE boundary, then additional cultural resources review would be required.

4.0 CONCLUSION

This is an Activity-Specific Categorical Exclusion based on the provisions of 10 CFR 1021, Subpart D, Appendix B, Categorical Exclusion B1.11, and only applies to the proposed action described herein. Any changes to the proposed action or future requests for fencing, signage, and gates on the Hanford Site would be evaluated on a case-by-case basis.

 III. Applicable Reviews (attach to NRSF):

 Biological Review Report #:
 ECR-2016-628; MSA-1702659, dated June 20, 2017

 Cultural Review Report #:
 HCRC-2016-600-015; MSA-1702659, dated June 20, 2017

 Additional Attachments:
 Table 1 - New Hanford Site Boundary Fencing, Signage, and Gate Requirements

 Figure 1 - Fencing, Signage, and Gate Plan
 Figure 2 - Fence Gate Schematic

 Figure 3 - Area of Potential Effect (HCRC-2016-600-015)

NEPA REVIEW SCREENING FORM	Doci	ument ID	#:		
for Actions Included in CXs (Continued)	DOE	/CX-001	5.0		
IV: Existing Documentation:		5			
Are the impacts of the proposed action evaluated in a previous EA, EIS, or CERCLA document?		Yes	No No		
If "YES", use Site Form A-6006-948, Actions Adequately Evaluated in NEPA or CERCLA Document					
V. Categorical Exclusion:					
Does the proposed action fall within a category of actions that is listed in Appendixes A or B to Subpart D of 10 CFR 1021? If extraordinary circumstances or integral elements would preclude the use of a CX, check "		🛛 Yes	No_No		
Are there extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal?		Yes	No No		
Is the proposal connected to other actions with potentially significant impacts or result in cumulatively significant impacts (not precluded by 40 CFR 1506.1 or 10 CFR 1021.211)?	cant	Yes	No No		
List CX to be applied and complete Categorical Exclusion Integral Elements (where an action might fit within multiple CXs, use the CX that best fits the proposed action): 10 CFR 1021, Subpart D, Appendix B, B1.11, "Fencing"					
Categorical Exclusion Integral Elements:					
Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, or health, including DOE and/or Executive Orders?		Yes	No No		
Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?		Yes	No No		
Would the proposed action disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled unpermitted releases?	or	Yes	No No		
Would the proposed action adversely affect environmentally sensitive resources?		Yes	No No		
Would the proposed action involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species such that the action is not contained or confined in a manner designed, operated, and conducted in accordance with applicable requirements to prevent unauthorized release into the environment?	r I	Yes	No No		
If "NO" to all Integral Elements questions above, complete Section VI, and provide NRSF to DOE NCO for review. If "YES" to any of the Categorical Exclusion Integral Elements questions above, contact DOE NCO for additional NEPA Review.					

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VI. Responsible Contractor Signatures:					
Initiator: Joy M. Shoemake (MSA-RES) Name Print Signature	<u>9-21-11</u> Date				
Cognizant Environmental Compliance Officer:					
Jerry W. Cammann (MSA NEPA-SME) Name Print Signature	9/27/17 Date				
VII. DOE Approval/Determination	, <u></u>				
DOE NEPA Compliance Officer: Diori L. Kreske, DOE-RL OCC, NEPA Compliance Offic	er (NCO)				
Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), the proposed action fits within the specified class of action:					
NCO Determination: 🔀 CX *NCO Recommendation: 🔲 EA 🗌 EI	S				
Divi Huske Signature 9/0	27/17 Date				
*NRSF A-6006-950 would be completed by responsible contractor					

## ATTACHED TABLES AND FIGURES (DOE/CX-00150)

Table 1 – New Hanford Site Boundary Fencing, Signage, and Gate Requirements (1 page)

Figure 1 – Fencing, Signage, and Gate Plan (1 page)

Figure 2 – Fence Gate Schematic (1 page)

Figure 3 – Area of Potential Effect (HCRC-2016-600-015) (1 page)

# Table 1. New Hanford Site Boundary Fencing, Signage, and Gate Requirements

New Hanford Site Boundary Fencing, Signage, and Gate Requirements				
Activity	Length/Number	Comments		
Existing fencing and signage	31,133 feet	Fence/signs currently exist.		
Fenced, but signage is required	9,845 feet	Place signs at 500-feet increments		
	9,845 Teet	along existing fencing.		
New fencing and signage required 25,507 fe	2E EO7 foot	Install new fencing and place signs at		
	25,507 Teet	500-feet increments along fencing.		
Steel access gates required	C	Gates installed where new fencing		
	6	crosses existing unimproved dirt roads.		

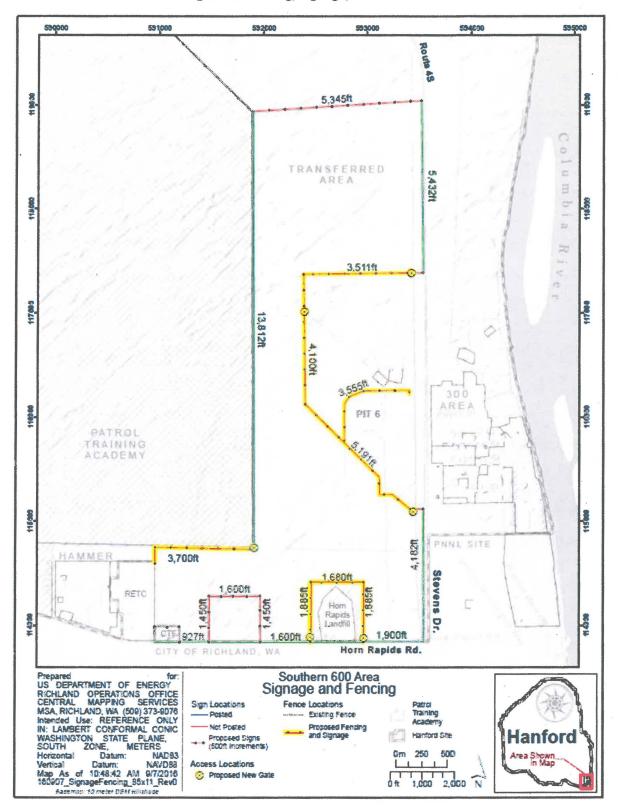
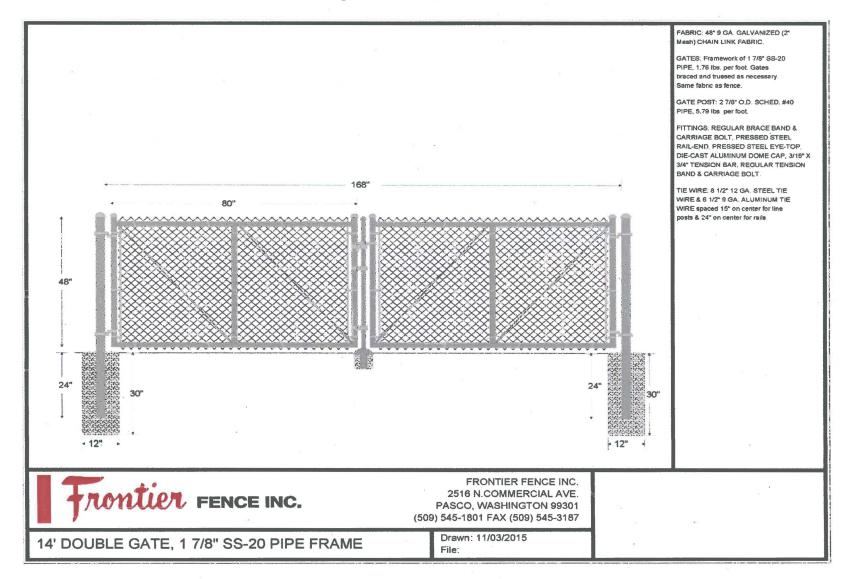
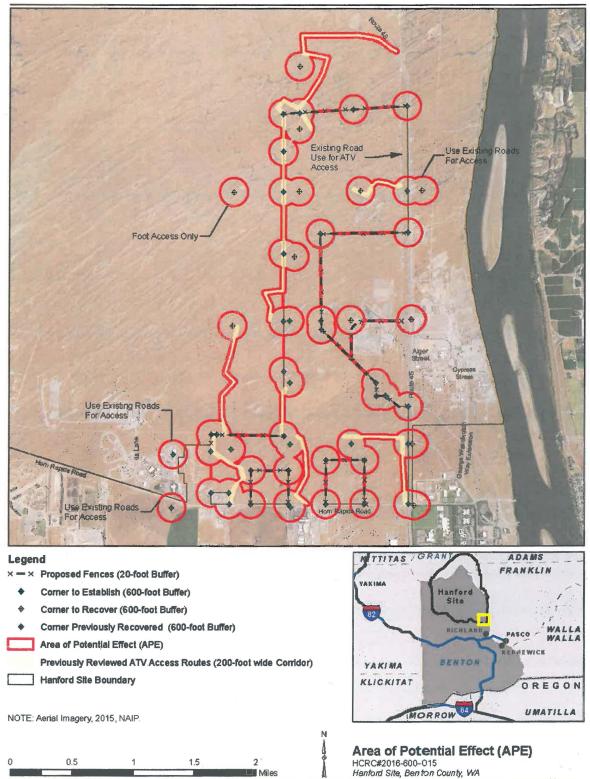


Figure 1. Fencing, Signage, and Gate Plan

Figure 2. Fence Gate Schematic





# Figure 3. Area of Potential Effect (HCRC-2016-600-015)

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