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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: April 30, 2018

REPLY TO ATTN OF: EPR-4

SUBJECT: North Bonneville-Midway No. 1 Miles 1-80 Impairment Remedies Project

TO: Mark Korsness
Project Manager - TEP-TPP-1

Attached to this memorandum is BPA's CX Determination for the North Bonneville-Midway No. 1 Miles 1-80 Impairment Remedies Project. Also included is the CX checklist that supports this determination.

The CX checklist identifies mitigation measures required to help your project meet environmental laws or CX criteria. The EP environmental lead that will help facilitate implementation of mitigation measures required is Aaron Siemers, EPR-4.

Please be aware that if project changes are required that involve new locations to be disturbed not analyzed as part of the CX (such as landing pads, relocations, access road widening, tree clearing, new structures, etc.), you need to immediately contact me at 503-230-3078 to determine if additional environmental review is required.

Thank you,

/s/ *Aaron Siemers*
Aaron Siemers
Physical Scientist (Environmental)

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: North Bonneville-Midway No. 1 Miles 1-80 Impairment Remedies Project

PP&A No.: 3,322

Project Manager: Mark Korsness – TEP-TPP-1

Location: Skamania County, Washington; Klickitat County, Washington; Benton County, WA

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):
B1.3 Routine Maintenance

Description of the Proposed Action: A recent LIDAR scan of the North Bonneville-Midway No. 1 230 kV transmission line identified eleven critical impairments to the line, where the clearance between the ground surface and the electrical conductor is not in compliance with industry safety and reliability standards. These eleven impairments are located at isolated spans within line miles 1 through 80 of the transmission line, as it trends from N. Bonneville Substation in Skamania County, WA, to Midway Substation in Benton County, WA.

BPA intends to remedy the impairments at these eleven locations through excavation and ground clearing in four locations (spans 4/4, 4/5, 49/2 and 63/6); installing or changing transmission tower hardware at five locations (spans 15/1, 16/3, 27/1, 41/1, and 55/2); and installing prop structures at two locations (spans 36/4 and 43/6). Approximately 2.5 miles of access road and landing improvements within the existing access road footprint would be required to complete the work, as well as the construction of approximately 250 feet of new access road within the transmission right-of-way to provide access to the new prop structures. For the impairment excavations, the total volume of the ground clearing and rock removal would be approximately 870 cubic yards. Fall protection would be added to the steel lattice towers undergoing hardware updates, and surge arrestors would also be upgraded at N. Bonneville Substation and Midway Substation.

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/ *Aaron Siemers*
Aaron Siemers
Physical Scientist (Environmental)

Concur:

/s/ *Sarah T. Biegel* Date: *April 30, 2018*
Sarah T. Biegel
NEPA Compliance Officer

Attachment(s):
Environmental Checklist

becc:
J. Sharpe – EP-4
F. Walasavage – EP-Celilo
G. Tippetts – EPR - Olympia
A. Siemers – EPR-4
L. Roberts – EPR-4
P. Smith – EPR-4
H. Adams – LN-7
S. Williams – TFDF – The Dalles
Official File – EP (EQ-15)

ASiemers:as:4-13-2018:3078:W:\EP\2018 Files\EQ-13 National Environmental Policy Act (NEPA)\CX\N. Bonneville-Midway Impairment\CX_N. Bonneville-Midway Impairment Remedies Environmental Checklist 04.26.18_STB.docx

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: North Bonneville-Midway No. 1 Miles 1-80 Impairment Remedies Project

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Project Site Description

The project is located at eleven distinct work sites spread over approximately 60 miles near the Columbia River gorge in Skamania County and Klickitat County, WA. The geography and ecology varies from site to site. The locations are listed in the table below.

All of the work sites are located within the cleared transmission line right-of-way. Sites 1 through 4 are located in the Western Cascades Lowlands and Valleys ecoregion. This ecoregion is characterized by a Pacific marine mild, wet climate and forests of western hemlock and Douglas-fir. Sites 1 and 2 are located near the city of Stevenson, WA. The transmission right-of-way in this area is dominated by Himalayan blackberry, Scotch broom, and a mixture of native and invasive grasses. The area has large basalt outcrops and is hilly. Access roads are utilized by locals for all-terrain vehicle recreation. Sites 3 and 4 are located in remote cleared forested lands of the Gifford Pinchot National Forest.

Sites 5 through 8 and site 10 are located in the Oak and Conifer Foothills ecoregion. This ecoregion has diverse habitat and geography, consisting of foothills, low mountains, plateaus and valleys, and elevations ranging 500 to 3,500 feet. The climate is influenced by the marine Pacific weather that enters the area through the Columbia River gorge. The ecoregion is characterized by Oregon white oak and ponderosa pine in the east, and Douglas-fir and western hemlock in the west. Site 5 is located in a commercial orchard and site 10 is located in a farmed field. Sites 6, 7, 8, and 9 are located in remote areas, with intermixed pine forests and grasslands of Idaho fescue and wheatgrass.

Sites 9 and 11 are located in the Yakima Plateau and Slopes ecoregion. This ecoregion has a dry continental climate and more severe weather. The geography is characterized by plateaus, buttes, and canyons. The area is forested with ponderosa pine, bitterbrush, Oregon white oak, and Douglas-fir. Sites 9 and 11 are located in remote areas, with ponderosa pine forests interspersed with grasslands and sagebrush, and ephemeral drainage channels.

Site #	Span	Township		Range		Section	County	Site Characteristics
1	4/4	2	N	7	E	2	Skamania	Western Cascades Lowlands & Valleys ecoregion
2	4/5	2	N	7	E	44	Skamania	Western Cascades Lowlands & Valleys ecoregion
3	15/1	3	N	8	E	13	Skamania	Western Cascades Lowlands & Valleys ecoregion
4	16/3	3	N	9	E	20	Skamania	Western Cascades Lowlands & Valleys ecoregion
5	27/1	3	N	10	E	11	Skamania	Oak & Conifer Foothills ecoregion
6	36/4	4	N	12	E	32	Klickitat	Oak & Conifer Foothills ecoregion
7	41/1	4	N	12	E	25	Klickitat	Oak & Conifer Foothills ecoregion
8	43/6	4	N	13	E	21	Klickitat	Oak & Conifer Foothills ecoregion
9	49/2	4	N	14	E	18	Klickitat	Yakima Plateau & Slopes ecoregion
10	55/2	4	N	15	E	6	Klickitat	Oak & Conifer Foothills ecoregion
11	63/6	5	N	16	E	28	Klickitat	Yakima Plateau & Slopes ecoregion

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**	☐	☑

Explanation:

Bonneville Power Administration engaged in consultation with the Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Cowlitz Indian Tribe, Nez Perce Tribe, Washington State Department of Natural Resources, U.S. Forest Service office for the Columbia River Gorge National Scenic Area, and WA Department of Archaeology and Historic Preservation (DAHP). The Cowlitz Indian Tribe responded to BPA in March of 2017 with inadvertent discovery language and other guidance, and the Confederated Tribes of the Warm Springs Reservation of Oregon responded in March of 2017 with additional guidance on cultural survey procedures.

BPA issued a Letter of Determination on August 31, 2017, that no historic properties would be affected by the project. BPA received a letter of concurrence from DAHP on August 31, 2017. Due to additional road work added to the project's scope that was not included in the original project description or area of potential effect (APE), on March 21, 2018, BPA issued an addendum to the original cultural survey report and a Letter of Determination that no historic properties would be affected by the project. BPA received a letter of concurrence from DAHP on March 22, 2018. No other consulted parties responded during the stipulated 30-day waiting period. Therefore, according to Section 106 of the National Historic Preservation Act and 36 CFR Part 800, BPA's consultation requirements have been fulfilled.

2.	**Geology and Soils**	☑	☐

Explanation:

At the two prop structure locations (sites #6 and 8 from the above table), soil disturbance associated with the direct embed installation of the prop structures would occur. The excavated material would be used as backfill once the wood poles are installed. Erosion control measures would be utilized and the areas would be revegetated upon project completion. At sites #1, 2, 9, and 11, excavation and ground clearing would occur.

Ground clearing ranges from removal of basalt rock outcrops, to excavating and regrading slopes. The rock outcrops are typical within the general project area and have no special significance. Post construction, normal weathering and vegetation growth would restore the general look of the exposed rock in the work areas. The regraded slopes would be stabilized and revegetated with a climate appropriate seed mix upon project completion. In some cases, top soil may be scraped and stored on site to be used in the site restoration process. At the other work sites, soil disturbance would be minimal, associated with light equipment traffic and some landing improvements. The project has no potential for significant impacts to geology and soils.

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

Explanation:

There are no special-status plant species present. Vegetation ranges from invasive species such as Himalayan blackberry and Scotch broom, to pervasive native grasses. Work is to be conducted in an existing transmission line right-of-way (ROW). The disturbed areas would be revegetated upon project completion with a climate appropriate grass seed mix. The project has no potential for significant impacts to plants.

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

Explanation:

Gray wolf, North American wolverine, northern spotted owl, and yellow-billed cuckoo are listed in the project area. Critical habitats of northern spotted owl and bull trout can be found in the general project area. Sites #3 and #4 are located within northern spotted owl critical habitat.

However, the work would be performed in the cleared and maintained transmission line right-of-way. At sites #3 and #4, the work plan involves light industrial activity, replacing insulators and other hardware on the transmission structures. No tree removal is planned. The project has no potential for significant impacts to wildlife. Please review BPA's No Effects Memorandum for the project if additional information is required.

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

The project would not be located in a floodplain or any waterbody. At sites #1 and #2, an adjacent perennial waterway is present and passes through the right-of-way. At site #9, an ephemeral waterway is present back-on-line. These and any other waterways would be avoided during construction. No culvert installation or repair, or other in-water work is proposed. Standard erosion and sediment control best management practices would be utilized to protect nearby waterways, where present, and there would be no impacts to water quality.

6. **Wetlands** ☑ ☐

Explanation:

There are no wetlands present in the project area.

7. **Groundwater and Aquifers** ☑ ☐

Explanation:

The work would not involve new groundwater wells or ground disturbance that would impact aquifers. The maximum depth of ground disturbance at ground clearing sites would be approximately 5 ft., and involves removing a basalt outcrop. The other two locations where ground clearing is proposed would involve ground disturbance of approximately 3 ft. maximum depth. At proposed prop structure installation sites, wood pole structures would be installed to approximately 10 ft. below ground surface. No groundwater is anticipated within

10 ft. below ground surface at the prop structure locations.

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

Explanation:

Sites #1, 2, 3, and 4 are located in the Columbia Gorge National Scenic Area, which is managed by the U.S. Forest Service. Site #2 is designated urban, and therefore no land use restrictions to BPA operations from the U.S. Forest Service apply. BPA consulted with the Forest Service regarding the proposed action at sites #1, 3, and 4. In a letter dated November 8, 2016, the USFS concurred with BPA that the proposed action was consistent with the Savings Provision of the Columbia River Gorge National Scenic Area. The project has no potential for significant impacts to existing land use or specially designated areas.

9.	**Visual Quality**	☑	☐

Explanation:

The proposed work would be conducted in the previously-disturbed transmission right-of-way, adjacent to existing transmission structures and access roads. At sites #6 and 8, the addition of new wood pole prop structures to mitigate the impairment would not have significant impacts on the visual quality of the area. At sites #1, 2, 9, and 11, rock outcrops would be removed and/or topsoil would be scraped and excavated. The area would be regraded and revegetated. The current visual quality would most likely be restored within one to two growing seasons. At sites #3, 4, 5, 7, and 10, changes to the existing hardware configuration on the transmission towers would not significantly alter the visual quality of the transmission corridor. The project has no potential for significant impact to visual quality.

10.	**Air Quality**	☑	☐

Explanation:

The project would create temporary dust and vehicle emission due to construction; however, no significant impacts would occur.

11.	**Noise**	☑	☐

Explanation:

The project would create temporary noise due to construction; however, no significant impacts would occur.

12.	**Human Health and Safety**	☑	☐

Explanation:

During project activity, all standard safety protocols would be followed. Fall protection safety hardware would be installed on several steel lattice towers where work would be conducted. This would benefit worker safety long-term. Other than that, the project would not have significant impacts on human health or safety.

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: N/A

☑ 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: N/A

☑ 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: N/A

☑ 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: N/A

Landowner Notification, Involvement, or Coordination

Description: The proposed project is located on private land; and land owned by the U.S. Army Corps of Engineers, the State of Washington, and the Columbia Gorge National Scenic Area - which is managed by the U.S. Forest Service. BPA would continue ongoing coordination with the landowners and land management agencies during project activities.

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

Signed: /s/ *Aaron Siemers* Date: *April 30, 2018*
Aaron Siemers
Physical Scientist (Environmental)