Categorical Exclusion Determination

Bonneville Power Administration Department of Energy



Proposed Action: Knight-Ostrander No. 1 Miles 63-65 (Tanner Creek Road) Periodic Access Road Improvement Project

PP&A No.: 4,486

Project Manager: Donna Martin, TELF-TPP-3

Location: Multnomah County, OR

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021)</u>: B 1.3 Routine Maintenance

Description of the Proposed Action:

BPA is proposing to conduct periodic routine maintenance along Tanner Creek Road/USFS Road 777, which is located in the far northeast corner of Multnomah County directly south of Bonneville Dam and I-84. The road provides access to twelve steel lattice structures along line miles 61 through 63 of BPA's 500 kV Knight-Ostrander No. 1 transmission line. The road also provides access to a NOAA weather station.

Tanner Creek Road/USFS Road 777 is located in an area of the Columbia River Gorge that was severely burned by the 2017 Eagle Creek Fire. Currently, the vast majority of trees along the road and in the general area are standing dead. In the immediate aftermath of the fire, BPA conducted emergency road work to ensure that BPA transmission line maintenance crews would be able to access the Knight-Ostrander No. 1 line in the event of a land slide or other emergency. The road surface was graded and rocked, and water crossing features, such as cross drain culverts and water bars, were installed to protect the road from anticipated increased surface water flow and velocity due to the lack of vegetation from the forest fire.

Since that time, due to the fire and the already geologically unstable nature of the Columbia River Gorge, several small and large landslides have occurred, partially blocking the road. Cross-drain culverts and ditches have become plugged with silt and rocks, and large trees and tree limbs have fallen into the road footprint.

BPA plans to conduct periodic, routine maintenance along the roadway, from the gated entrance of the road near Acton Substation, south along the road to Knight-Ostrander No. 1 structure 65/1. Approximately 6 miles of road would be maintained including spur roads to transmission structures. BPA would clear slides and trees, maintain ditching, and remove rocks and silts from cross-drain culverts. Excess material generated by slide removal and culvert maintenance would be seeded and stabilized in a generally flat location or hauled and disposed off-site, minimizing risks to waterways. No construction or maintenance work in perennial or intermittent streams would occur.

To ensure safe reliable access to BPA transmission towers, BPA would conduct these routine maintenance activities on Tanner Creek Road/USFS Road 777 periodically; estimated every 12 to 24 months, for the next three to five years. BPA would notify and coordinate periodic, routine maintenance with the appropriate USFS office.

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, Jul. 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/ <u>Aaron Siemers</u> Aaron Siemers Environmental Protection Specialist

Concur:

/s/ <u>Sarah T. Biegel</u> Sarah T. Biegel, <u>August 11. 2020</u> NEPA Compliance Officer

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: Knight-Ostrander No. 1 Miles 63-65 (Tanner Creek Road) Periodic Access Road Improvement Project

Project Site Description

The access road improvement work is located in the Columbia River Gorge in the Western Cascades Lowlands & Valleys ecoregion. This ecoregion is characterized by a Pacific marine, mild, wet climate and forests of western hemlock and Douglas-fir. The work areas include the Bonneville-Hood River transmission and access road right-of-way (ROW), which runs generally parallel to the Columbia River and is approximately 0.25 miles from Interstate 84 and the Columbia River, to the Knight-Ostrander No. 1 access road system, known as Tanner Creek Road or USFS Road 777. Elevation ranges from approximately 400 feet near the ROW access point, to 1,200 feet above sea level near Knight-Ostrander No. 1 structure 65/1.

In general, the Eagle Creek fire has significantly altered the ecosystem and environment of the work area. The work area along Tanner Creek Road was severely burned, removing the majority of the surface vegetation, leaving large fir and hemlock trees completely defoliated and unstable, and combusting the organic material within the soil. The habitat and hydrology of this area will be changed for the foreseeable future. Vegetation is sparse, and includes native grasses, sword fern, and oxeye daisy. Some Douglas-firs and western hemlock, located in areas that the fire avoided, provide patchwork tree cover.

All project activities would be conducted on existing road cuts and previously disturbed areas within the Bonneville-Hood River No. 1 ROW and the Knight-Ostrander No. 1 access road system.

Township		Range		Section	County	Site Characteristics
2	Ν	7	E	21, PB 38, 28, PB 42, PB 46, PB 47	Multnomah Co., OR, Hood River Co., OR	Western Cascades Lowlands & Valleys
1	Ν	7	Е	UP 4		ecoregion

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation:

BPA engaged in consultation with the U.S. Forest Service in June and July of 2020. An area of potential effect (APE) for the project was defined and planned construction activities were discussed. Based on the existing

road conditions and proposed construction activities which would not include new ground disturbance, BPA and the USFS concurred that the undertaking would have no potential to affect historic properties.

In the unlikely scenario that historic or cultural resources are encountered during construction activities, all work would cease until it can be inspected and assessed by the appropriate parties.

2. Geology and Soils

Potential for Significance: No

Explanation:

The planned road improvements would occur on the pre-existing, established road footprint. Staging areas and turn-around zones for construction activity would be established in previously disturbed areas.

Notes:

• Any disturbed soils incidental to construction would be stabilized with native seed and weed-free straw or other acceptable erosion and sediment control methods.

3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation:

Light grading of the roads with heavy machinery would potentially disturb some vegetation immediately adjacent to the existing road footprint. These areas would be reseeded with native grasses post-construction. On the whole, native vegetation present in the area would not be significantly impacted by project activities.

BPA obtained a species list for the project on August 4, 2020. No Endangered Species Act (ESA)–listed plant species are present in the project area. In correspondence with USFS staff regarding the planned project, the USFS did not express concerns regarding the presence of sensitive plant species in the work areas.

Notes:

- Construction activity on undisturbed areas vegetated with native plants would be limited as much as possible.
- To reduce the risk of introducing invasive weeds, all equipment would be cleaned thoroughly, with pressurized water, of dirt and weeds before entering and before departing National Forest System lands.
- If fill material and aggregate is needed it would be from a certified weed-free source.

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

Potential for Significance: No

Explanation:

Construction on the project would likely disturb wildlife in the area due to the presence of humans and additional noise. However, disturbance would be temporary, and the forest provides ample habitat for wildlife outside of the immediate project area.

BPA obtained a species list for the project on August 4, 2020. An effects determination was conducted for northern spotted owl and northern spotted owl critical habitat. BPA determined that the project would have "no effect" on northern spotted owl and northern spotted owl critical habitat. In correspondence with USFS staff regarding the planned project, the USFS did not express concerns regarding the presence of sensitive wildlife species in the work areas.

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

Potential for Significance: No

Explanation:

The project area is not located in or near a floodplain. An unnamed tributary to Tanner Creek is present in the project area and crosses the access road via a ford crossing. Utilization of the ford crossing would be minimized as much as possible during construction to prevent degradation of the ford and sedimentation into the waterway. If degradation is anticipated, the ford crossing would be protected with metal plates or other barriers to mitigate impacts to water quality.

6. Wetlands

Potential for Significance: No

Explanation:

No wetlands are present in the project area.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation:

Excavation on the project would only include light grading and would not involve depths that would intersect groundwater and/or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation:

Land use consists of public lands managed by the USFS for recreation and wildlife habitat. The proposed project would not alter existing land use. The project is located within the Columbia Gorge National Scenic Area (CRGNSA). BPA consulted with the US Forest Service's CRGNSA office regarding the proposed project. BPA provided a description of the planned periodic maintenance and a map showing the road system where improvements were proposed. In correspondence dated June 23, 2020, the USFS CRGNSA office concurred that the project was consistent with the Savings Provision of the Columbia Gorge National Scenic Area Act and no further permitting would be required. The USFS requested that BPA implement erosion and sediment control best practices to limit sedimentation into waterways.

9. Visual Quality

Potential for Significance: No

Explanation:

No large trees would be removed during construction. The road grading and addition of rock would be consistent with existing visual quality.

Air Quality

Potential for Significance: No

Explanation:

Some dust may be generated due to construction traffic, transport, and placement of rock, and general construction activities. A fugitive dust plan would be implemented to control dust generation, if needed. With an appropriate dust control mitigation plan, the project would have minor, temporary impacts to air quality.

10. Noise

Potential for Significance: No

Explanation:

Some temporary noise may be generated due to construction traffic, transport, and placement of rock, and general construction activities. However, the project is in a relatively remote area, away from highly trafficked recreational sites and concentrated human activity.

11. Human Health and Safety

Potential for Significance: No

Explanation:

Tanner Creek Road/USFS Road 777 is used by BPA staff, USFS staff, and National Oceanic and Atmospheric Administration (NOAA) staff. While there is no official trail system associated with the road, it is also open to the general public for walk-in use. Proposed road improvements would improve the safety of the access road system that has been impacted by the ongoing consequences of the Eagle Creek fire by removing slides and stabilizing the stormwater drainage infrastructure.

The access road contractor would develop a site-specific safety plan (SSSP) to protect worker health and 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: 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: 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: 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: N/A

Landowner Notification, Involvement, or Coordination

Description:

BPA has notified and coordinated planned project activities with the USFS Columbia Gorge National Scenic Area Office. As the work plan would involve periodic maintenance over several years, BPA would continue to coordinate with all stakeholders as necessary during planning and construction going forward.

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

Signed: /s/ <u>Aaron Siemers</u> - EPR-4, <u>Date: August 11. 2020</u> Environmental Protection Specialist