NEPA REVIEW SCREENING FORM (NRSF) 3
Categorically Excluded Actions

Document ID #: DOE/CX-00236

I. Project Title:

Tucci Energy Services License Agreement and Categorical Exclusion to Perform Site Characterization within Electrical Powerline Right-of-Way for Proposed Ruby Flats Solar Farm

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)*, and area/location/number of buildings. Attach narratives, maps and drawings of proposed action. 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.

BACKGROUND AND PROPOSED ACTION

Tucci Energy Services (TES) proposes to construct their Ruby Flats Photovoltaic Solar Farm Project, which would require interconnection to the electrical grid at the Bonneville Power Administration (BPA) Benton Substation. The solar farm would be constructed on approximately 600 acres of land conveyed from the U.S. Department of Energy (DOE), Richland Operations Office (RL) to the Tri-City Development Council (TRIDEC), and subsequently to the Port of Benton and Energy Northwest, under the "Final Environmental Assessment for Proposed Conveyance of Land at the Hanford Site, Richland, Washington" and associated "Finding of No Significant Impact" (DOE/EA-1915, September 2015).

DOE-RL proposes to issue a license to TES and complete the National Environmental Policy Act (NEPA) review screening form (NRSF) determination process. The NRSF determination process is required to perform site characterization field work for ecological, cultural, and other environmental surveys of a proposed 100-feet wide by approximately 5-miles long electrical utility right-of-way (ROW) for DOE-RL to potentially issue a permanent easement to TES for the construction of a 115-kV powerline.

A separate DOE NRSF determination process would be completed for construction of the proposed Ruby Flats solar farm powerline. The NRSF determination process would normally be completed in advance of, and for use in reaching, a decision to proceed with detailed design. The preliminary design for the solar farm powerline includes the installation of 40 steel monopoles and associated electrical components, of which 38 monopoles would be on DOE-RL managed land. The steel monopoles would range from 80 to 90 feet tall with an average spacing of approximately 700 feet between each structure. The NRSF determination process for construction of the solar farm powerline would be informed by the results of the ecological, cultural, and other environmental field surveys and support a DOE NRSF determination of the level of NEPA review required to construct the powerline.

The land identified for the new solar farm powerline ROW would begin in the northern portion of the land conveyance area and travel east to the existing BPA Benton-White Bluffs No. 1 powerline ROW, then turn north at structure 3 and run parallel to, but not within, BPA's ROW to the Benton Substation for interconnection. There is inadequate room for both powerlines to share the existing BPA ROW. The new solar farm powerline ROW would include a 50-feet wide buffer on either side of the proposed steel monopole alignment (see Figures 1, 2, and 3).

Proposed field work to survey the solar farm powerline ROW includes TES seasonal access to conduct non-intrusive ecological and cultural investigations required by the Endangered Species Act (ESA), the National Historical Preservation Act (NHPA), and NEPA. The ESA reviews and reports would be conducted in cooperation with the DOE-RL Ecological Compliance Program (ECP) Manager. The NHPA reviews and reports would be conducted in cooperation with the DOE-RL Cultural and Historic Resources Program (CHRP) Manager. NEPA is an inherently federal government function and all determinations must be made by, and be traceable to, DOE personnel responsible for NEPA compliance (e.g., the DOE Hanford Site NCO).

During the performance of field surveys, TES and its authorized representatives would have a non-exclusive right of ingress and egress to and from the solar farm powerline ROW. This includes travel over DOE-RL managed lands using existing paved and unpaved roads. All activities would be performed in a manner to avoid endangering personnel or property of the federal government and its contractors, and would be in accordance with the provisions of applicable laws, regulations, ordinances, licenses, and other governing documents.

To reduce potential impacts to resources on DOE-RL managed lands, the license agreement between DOE-RL and TES to conduct proposed ecological, cultural, and other environmental field surveys

includes the following stipulations:

• TES and its authorized representatives use of the land would be subject to such rules and regulations regarding safety, security, ecological resources, cultural resources, environmental, and site access as DOE-RL may prescribe from time to time.

• TES would not install or allow the installation of any equipment owned and operated by others on DOE-RL managed land without prior written approval by DOE-RL.

• At the end of each seasonal use, all personal property of TES would be removed and TES would cleanup all garbage and debris before leaving the area. TES acknowledges and agrees that it would exercise caution to ensure that spills of hazardous waste or other contamination does not occur. In the event of a spill, TES would immediately notify DOE-RL to initiate appropriate spill reporting and cleanup activities.

• TES and its authorized representatives would restrict vehicular traffic and placement of facilities and equipment to existing roads and previously disturbed and developed areas. No off-road vehicle access would be allowed.

• No excavation or ground disturbing activities would be allowed unless approved by the DOE-RL CHRP Manager. TES would be responsible for notifying the DOE-RL CHRP Manager prior to any excavation work being performed.

• No disturbance or removal of cultural material would be allowed. All project personnel would be instructed to watch for cultural materials (e.g., bones, stone tools, mussel shell, arrowheads, burned rocks/charcoal, cans, and bottles, etc.) during all work activities. If any cultural materials are encountered, work in the vicinity of the discovery would stop until the DOE-RL CHRP Manager has been contacted, the significance of the find assessed, appropriate consulting parties notified, and if necessary, arrangements made for mitigation of the find.

DOE-RL has authorized its Hanford Mission Essential Services Contractor (HMESC) to administer the license agreement on behalf of DOE-RL to accommodate additional services deemed necessary for TES to conduct field surveys. TES and its authorized representatives would coordinate with the HMESC to determine what additional administrative services are deemed necessary to conduct field surveys. These services include, but may not be limited to, ecological and cultural information requests, emergency services, excavation permits, security badging services, and cultural and ecological resource services. All terms, conditions, and other stipulations contained in the license agreement between DOE-RL and TES are hereby incorporated by reference into this NRSF. In the event of conflict between the license agreement and this NRSF, the license agreement would prevail. However, changes to the proposed action addressed by this NRSF may require additional review as determined by the DOE Hanford Site NCO.

ECOLOGICAL RESOURCES

The "Hanford Site Biological Resources Management Plan" (BRMP, DOE/RL-96-32, Rev. 2) establishes DOE's management objectives, strategies, actions, and general directives for managing biological resources on the Hanford Site. The purpose of the BRMP is to provide organizations conducting work on the Hanford Site with a consistent approach to protect and manage biological resources on the site. Essential aspects of Hanford Site biological resources management include resource monitoring, impact assessment, mitigation, and restoration.

The proposed ecological survey results would be considered within the context of the BRMP. The BRMP is the primary implementation document for managing and protecting ecological resources on the Hanford Site. The BRMP ranks wildlife species and habitats based on the level of concern for each resource (Levels 0 through 5) with Level 0 representing the lowest and Level 5 the highest.

Mitigation is a series of prioritized actions that reduce or eliminate adverse impacts to biological resources including avoidance, minimization, onsite rectification, and offsite compensation. Avoidance and minimization are always preferable to onsite rectification and offsite compensation, and should always be considered and implemented first. The BRMP Level 0 and 1 habitats have little to no ecological value, and no onsite rectification or offsite compensation is required other than compliance with applicable regulations (e.g., Migratory Bird Treaty Act). For BRMP Level 2, 3, and 4 habitats, offsite compensation may be triggered if the total project

impact after avoidance, minimization, and onsite rectification is greater than 1.2 acres. Offsite compensation replacement ratios for BRMP Level 2, 3, and 4 habitats are 1:1, 3:1, and 5:1, respectively. The BRMP Level 5 habitats are considered irreplaceable "element occurrences" as there is no practical way to replace or restore resources if lost; therefore, compensatory mitigation is determined on a case-by-case basis.

Plant communities that are considered rare or relatively unprotected and vulnerable to disturbance are considered a conservation priority, which are tracked in Washington State by the Washington Natural Heritage Program (WNHP) as an "element occurrence" (i.e., BRMP Level 5 habitat). Particularly significant for the Hanford Site is the high conservation status of active and stabilized sand dunes and shrub steppe ecosystems. The approximately 158 acre stabilized sand dune area north of the Hanford Site 300 Area, which would contain a portion of the solar farm powerline, has been identified as an WNHP element occurrence (see Figure 4). The more stabilized areas exhibit well developed shrub structure that includes antelope bitterbrush, snow buckwheat, big sagebrush, and spiny hopsage. Additional areas in good condition include areas in which needle-and-thread grass cover is relatively high, but much of the site also has a relatively high cover of cheatgrass. Determining the importance of this generally stabilized site is problematic, since sand dunes are generally considered to be open systems. However, the importance of recognizing and maintaining reference sites that demonstrate how such sites with a diversity of native sand dune related species may function during longer periods of stabilization is still considered a conservation concern to the WNHP.

TES would coordinate with the DOE-RL ECP Manager to ensure adherence to BRMP guidelines and applicable regulatory requirements while conducting ecological surveys on DOE managed lands. Unless otherwise controlled by legal or contractual requirements, the BRMP applies to all DOE managed lands under lease, permit, easement, or ROW.

CULTURAL RESOURCES

DOE-RL is responsible for managing Hanford Site cultural and historic resources and maintains the Hanford Site CHRP. The CHRP ensures that cultural resources entrusted to DOE-RL are managed with vision, leadership, and responsibility. Some technical activities at the Hanford Site are performed by cultural resource contractors and, in some cases, by cleanup contractors who perform their own cultural resources work. The DOE-RL CHRP Manager provides oversight of all cultural resource work performed on DOE-RL managed portions of the Hanford Site. Plans and reviews of major products are prepared in consultation with the Washington State Historic Preservation Officer, Hanford Site area Native American Tribes, and other consulting parties, as applicable. If appropriate, the Advisory Council on Historic Preservation (ACHP) may also be engaged.

Cultural resource protection for DOE-RL managed land is governed by the "Hanford Site Cultural Resources Management Plan" (CRMP, DOE/RL-98-10, current revision). This management plan provides the details concerning the DOE-RL CHRP. It describes the program goals; the facilities; the cultural and historical setting and associated cultural resources; the program accomplishments, methods, and procedures; and administrative details.

TES and its authorized representatives would deliver to the DOE-RL CHRP Manager all preliminary and final reports regarding research or field investigations including archaeological site and survey information, completed site records for any new archaeological sites that are identified, and any amendments to previously recorded archaeological sites for incorporation within the DOE-RL CHRP database and related files.

CONCLUSION

The proposed action to issue a lease to TES to perform biological, cultural, and other environmental reviews along the proposed powerline ROW between the solar farm and the BPA Benton Substation has coverage under multiple 10 Code of Federal Regulations (CFR) 1021, subpart D, appendix B, categorical exclusions (CXs) identified in DOE's NEPA Implementing Procedures.

Issuance of the lease is covered under CX B1.24, "Property Transfers." This CX addresses transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the

environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests.

The proposed action to conduct site characterization field work for ecological, cultural, and other environmental surveys is covered by CX B3.1, "Site Characterization and Environmental Monitoring." This CX covers site characterization and environmental monitoring activities designed in conformance with applicable requirements and uses best management practices to limit the potential effects of any resultant ground disturbance. Among other things, subpart (i) covers activities related to sampling of flora and fauna; and subpart (j) covers archaeological, historic, and cultural resource identification in compliance with 36 CFR 800, "Protection of Historic Properties" and 43 CFR 7, "Protection of Archaeological Resources." Best management practices would be in accordance with the provisions in the BRMP (DOE/RL-96-32, Rev. 2) and the CRMP (DOE/RL-98-10, current revision). In accordance with 10 CFR 1021.410(d), CXs include activities foreseeably necessary to implement proposals encompassed within the class of actions (i.e., award of implementing grants and contracts, site preparation, purchase and installation of equipment, and associated transportation activities).

Any changes to the proposed action described in this NRSF may require additional review and approval as determined by the DOE Hanford Site NCO.

III. Existing Evaluations *(Provide with NRSF to DOE NCO)*:

Maps:

Figure 1. Ruby Flats Solar Farm Powerline Route from Land Conveyance Area and North Along BPA Benton-White Bluffs No. 1 Road (also known as Wisconsin Street)

Figure 2. Continuation of Ruby Flats Solar Farm Powerline Route from Land Conveyance Area and North Along BPA Benton-White Bluffs No. 1 Road (also known as Wisconsin Street)

Figure 3. Ruby Flats Solar Farm Powerline Route from Land Conveyance Area and North Along BPA Benton-White Bluffs No. 1 Road (also known as Wisconsin Street) Terminating at BPA's Benton Substation

Figure 4. 300 Area Stabilized Dune Element Occurrence (BRMP Level 5 Habitat)

Other Attachments:

N/A

IV. List Applicable CX(s) from Appendix B to Subpart D of 10 CFR 1021:

B1.24, "Property Transfers" and B3.1, "Site Characterization and Environmental Monitoring"

NEPA REVIEW SCREENING FORM 3 **Categorically Excluded Actions** (Continued)	**Document ID #:** DOE/CX-00236

V. Integral Elements and Extraordinary Circumstances ***(See 10 CFR 1021, Subpart D, B. Conditions that are Integral Elements of the Class of Actions in Appendix B; and 10 CFR 1021.410(b)(2) under Application of Categorical Exclusions)***	**Yes**	**No**
Are there extraordinary circumstances that may affect the significance of the environmental effects of the proposed action? If yes, describe them.	○	◉
Is the proposed action connected to other actions with potentially significant impacts, or that could result in cumulatively significant impacts? If yes, describe them.	○	◉
Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements related to the environment, safety, health, or similar requirements of DOE or Executive Orders?	○	◉
Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?	○	◉
Would the proposed action disturb hazardous substances, pollutants, contaminants, or natural gas products already in the environment such that there might be uncontrolled or unpermitted releases?	○	◉
Would the proposed action have the potential to cause significant impacts on environmentally sensitive resources? See examples in Appendix B(4) to Subpart D of 10 CFR 1021.	○	◉
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?	○	◉

If "No" to all questions above, complete Section VI, and provide NRSF and any attachments to DOE NCO for review.
If "Yes" to any of the questions above, contact DOE NCO for additional NEPA review.

VI. Responsible Organization's Signatures:

Initiator:

Jerry W. Cammann, HMIS/NEPA SME	JERRY CAMMANN (Affiliate) Digitally signed by JERRY CAMMANN (Affiliate) Date: 2024.07.17 11:37:46 -07'00'
Print First and Last Name	*Signature / Date*

Cognizant Program/Project Representative:

Tashina R. Jasso, DOE-RL/SSD	Digitally signed by TASHINA JASSO Date: 2024.07.22 12:47:00 -07'00'
Print First and Last Name	*Signature / Date*

VII. DOE NEPA Compliance Officer Approval/Determination:

Based on my review of information conveyed to me concerning the proposed action, the proposed action fits within the specified CX(s): ☒ Yes ☐ No

Douglas H. Chapin, DOE Hanford Site NCO	Douglas H. Chapin Digitally signed by Douglas H. Chapin Date: 2024.07.22 13:24:48 -07'00'
Print First and Last Name	*Signature / Date*

NCO Comments:

Figures for DOE/CX-00236

Tucci Energy Services License Agreement and Categorical Exclusion to Perform Site Characterization within Electrical Powerline Right-of-Way for Proposed Ruby Flats Solar Farm

5 pages (including this page)

Figure 1. Ruby Flats Solar Farm Powerline Route from Land Conveyance Area and North Along BPA Benton-White Bluffs No. 1 Road (also known as Wisconsin Street)

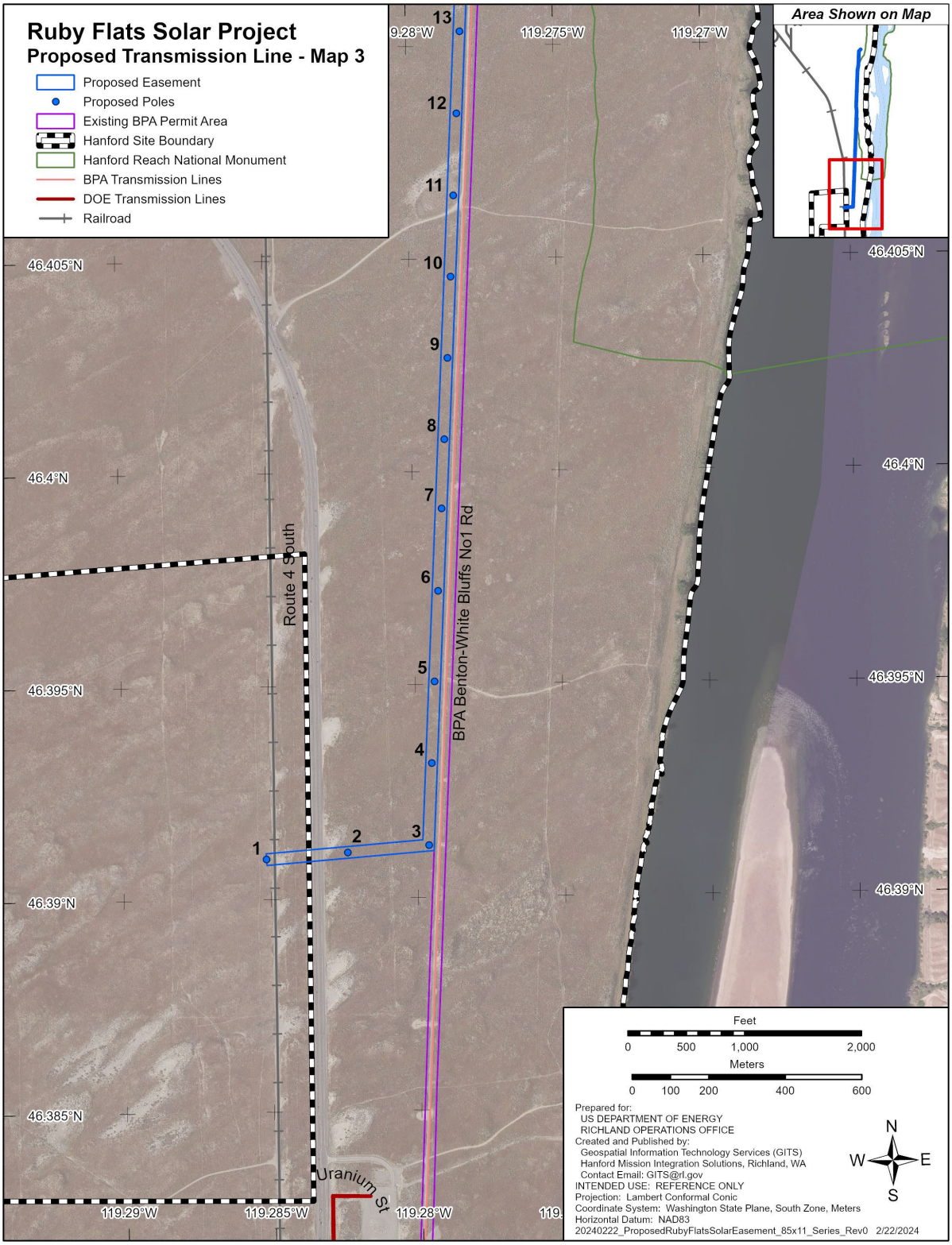
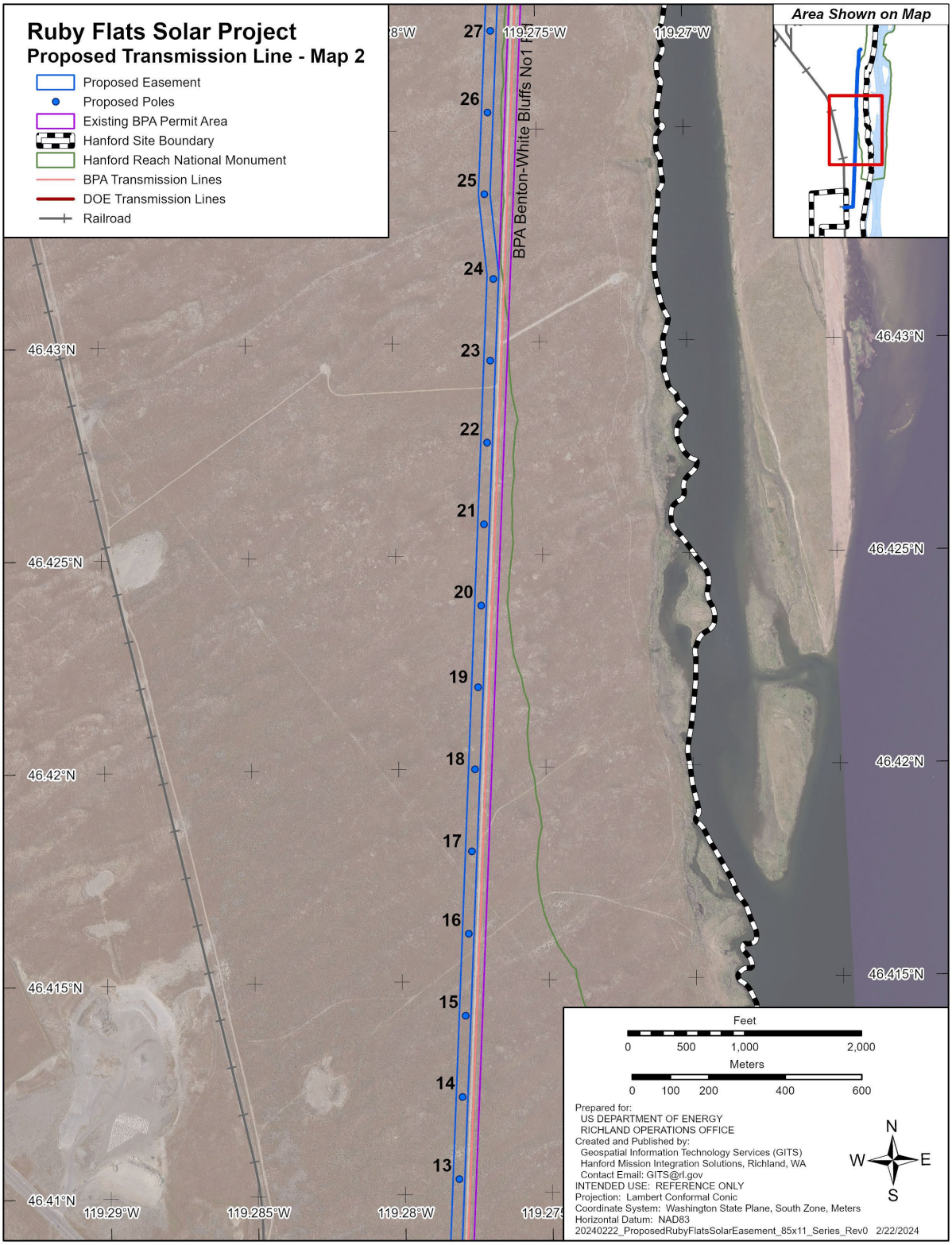


Figure 2. Continuation of Ruby Flats Solar Farm Powerline Route from Land Conveyance Area and North Along BPA Benton-White Bluffs No. 1 Road (also known as Wisconsin Street)



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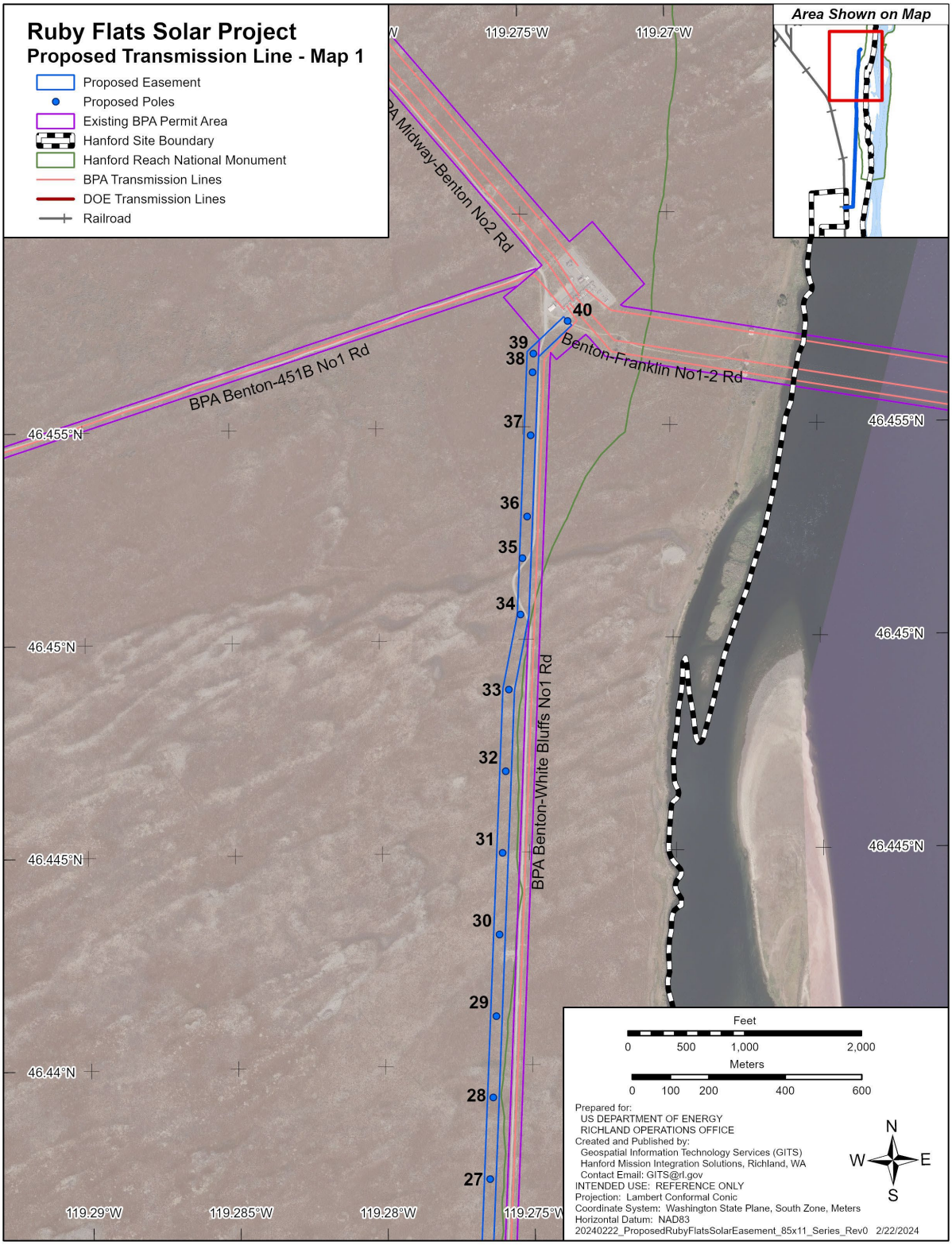

Figure 4. 300 Area Stabilized Dune Element Occurrence (BRMP Level 5 Habitat)