

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Ashe-Marion No. 2 Mile 179 Culvert Installation and Road Improvements and Jones Canyon-Santiam No. 1 Mile 105 Gate Installation Project

**PP&A No.:** 4,149

**Project Manager:** Ryan Martin, TELF-TPP-3

**Location:** Clackamas County, OR and Marion County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine Maintenance & B4.6 Additions and Modifications to Transmission Facilities

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to install a cross-drain culvert, improve approximately 800 ft. of existing U.S. Forest Service (USFS)/BPA access roads, and maintain ditching on shared USFS/BPA access roads near line mile 179 of the Ashe-Marion No. 2 high voltage transmission line in Clackamas Co., OR, Mt. Hood National Forest. The culvert would address issues with ponding, standing water, and erosion during spring melt due to the existing access road blocking the ditching and surface water flow along the roadway at an intersection in the USFS/BPA road network. Access roads would be lightly bladed and rocked. Existing ditching in the immediate area would be cleared of debris and maintained as necessary. No tree removal or other work is planned at this work location.

BPA is also planning on replacing and relocating a heavy duty gate on a BPA access road near line mile 105 of the Jones Canyon-Santiam No. 1 transmission line in Marion Co., OR. The gate is currently inoperable and needs to be replaced. It would be moved at the request of the USFS approximately 120 feet to the south. No additional work is planned at this location.

**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/ Aaron Siemers*  
Aaron Siemers  
Environmental Protection Specialist

Concur:

*/s/ Sarah Biegel*  
Sarah T. Biegel  
NEPA Compliance Officer

Date: April 17, 2020

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:** Ashe-Marion No. 2 Mile 179 Culvert Installation and Road Improvements and Jones Canyon-Santiam No. 1 Mile 105 Gate Installation Project

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## Project Site Description

The Ashe-Marion No. 2 Mile 179 Culvert Installation and Road Improvements and Jones Canyon-Santiam No. 1 Mile 105 Gate Installation Project (Project) is located in the Cascade Mountains in central Oregon, in the Cascade Crest Montane Forest ecoregion. The ecoregion is characterized by irregular plateau interspersed with volcanic mountains and lava flows. Relatively small glacier lakes are present, with native forests of mountain hemlock, Pacific silver fir, and pine species. Summers have less drought period than in the southern Oregon Cascades.

Both project areas are in locations where transmission line easement and access roads have altered the natural landscape. At the Ashe-Marion No. 2 Mile 179 location, the approximately 15 ft. wide gravel access road is lined with small firs, pines, and native grasses. Historical logging activities appear to have left the area with a patchwork forest of early to mid-successional coniferous trees, and small deciduous trees line waterways and wet areas. The 300 ft. cleared transmission line easement for the Ashe-Marion No. 2 line and other high voltage lines crosses the road generally trending east-west. Vegetation within the easement is periodically cut to promote low-growing species and maintain clearances. The headwaters of a waterway identified as Chief Creek is mapped in the area. In spring and early summer, overland surface water flow gathers in waterways and flows downhill before merging with the Peavine Creek approximately two miles downstream, and the Oak Grove Fork of the Clackamas River approximately four miles downstream.

At the culvert installation work site, ditching on the west side of the USFS access road has captured surface water flow, which is then dammed and ponded when flow reaches a BPA transmission line access road. The cross-drain culvert installation would connect the surface water hydrology at this location. The surface water channel in this area is generally vegetated to muddy; no discernible bed and bank are present, and no streambed gravels or sands were observed in the immediate project area. The culvert and road work location is within the western extent of a designated critical habitat zone for northern spotted owl.

At the Jones Canyon-Santiam No. 1 gate removal and replacement work location, the BPA gravel access road intersects the cleared high-voltage transmission easement. Vegetation consists of early to mid-successional coniferous trees and native grasses and shrubs. Soils are thin, with rock outcrops present. Squirrel Creek is located approximately 1,000 ft. to the west, and Surprise Lake is located approximately 600 ft. to the north of the gate installation.

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
<b>1. Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u></p> <p>On May 22, 2019, BPA engaged in consultation with the Confederated Tribes of the Warm Springs, the Oregon State Historic Preservation Office (OR SHPO), and the U.S. Forest Service. BPA identified an area of potential effect and detailed proposed project activities. A literature review and a field survey of the area of potential effect was conducted in the summer of 2019. On October 16, 2019, BPA sent a determination letter stating that the undertaking would result in no historic properties affected. OR SHPO responded with concurrence on November 15, 2019.</p> <p>In the unlikely event that cultural material is inadvertently encountered during the implementation of the project, BPA would require that the work be halted in the vicinity of the finds until they can be inspected and assessed by the appropriate consulting parties.</p>		
<b>2. Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u></p> <p>Project would consist of excavating near and within existing USFS/BPA access roads. Approximately 20 cubic yards of native and fill material would be excavated and later backfilled. Excess excavated soils would be spread on site and stabilized as necessary.</p> <p><u>Note:</u></p> <ul style="list-style-type: none"><li>Disturbed soils not within the road footprint including ditching would be seeded with a native seed mix and stabilized using erosion and sediment control best management practices, including mulch and erosion control blankets.</li></ul>		
<b>3. Plants (including Federal/state special-status species and habitats)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u></p> <p>Project activities would have very little impact on local vegetation. The work is planned to occur on and immediately adjacent to existing gravel access roads. Some vegetation in ditching may be impacted during maintenance, but BPA would reseed any disturbed soils and stabilize soils to promote revegetation.</p> <p>BPA obtained an official species list for the project from the U.S. Fish and Wildlife Service on January 21, 2020. Whitebark pine is the only Endangered Species Act (ESA)-listed species potentially present in the project area. No tree removal is planned for the project, with the exception of small saplings immediately adjacent to the roadway that may be present in ditching. BPA has determined that the project would have "No Effect" on Endangered Species Act-listed species in the project area. Please review the Project's Effects Determination Memo for more information.</p>		

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



Explanation:

Excavating and construction activity in the project area would likely temporarily disturb wildlife such as deer, birds, and small mammals due to the presence of human activity, machinery operation, and noise.

BPA obtained an official species list for the project area from U.S. Fish and Wildlife Service on January 21, 2020. The Ashe-Marion No. 2 Mile 179 culvert installation location is within northern spotted owl designated critical habitat and near historical northern spotted owl nest locations. The Jones Canyon – Santiam No. 1 Gate Installation project location is also located near northern spotted owl critical habitat.

The northern spotted owl nesting period is generally March 1<sup>st</sup> – September 30<sup>th</sup>, but the late nesting period is defined as July 16<sup>th</sup> – September 30<sup>th</sup>, when juvenile northern spotted owl have greater mobility and are able to avoid disturbances and disruptions.

BPA has consulted with USFS biologists regarding effects to northern spotted owl. Planned construction activities fall under the USFS’ programmatic Biological Assessment for Routine Land Management Activity. BPA has determined that the project “may effect, but is not likely to adversely” northern spotted owl.

BPA has determined that the project will have “no effect” on other ESA-listed species in the project area. BPA has also evaluated effects to other species such as USFS Region 6 Sensitive Species. Please review the Project’s Effects Determination Memo for more information.

Note:

- BPA would complete work on the project during the late nesting period; July 16<sup>th</sup> – September 30<sup>th</sup>.

5. **Water Bodies, Floodplains, and Fish**

(including Federal/state special-status species, ESUs, and habitats)



Explanation:

During the initial site visit in May 2019, surface water flow was observed in ditching adjacent to the primary USFS access road (NF 5732). The existing BPA access road, which intersects NF 5732 in a T-like shape, was observed to interrupt the ditching of NF 5732, which was resulting in ponded water and muddy conditions on the BPA access road. In the general area, the National Hydrography Dataset maps show the headwaters of a waterway identified as Chief Creek. It appears that several ephemeral, intermittent, and perhaps perennial waterways emerge in this area to form Chief Creek, and some surface water flow is being captured in the ditching adjacent to NF 5732 that may be Chief Creek or a tributary to Chief Creek. The channel in this area is vegetated to muddy, with no discernible bed or bank, and no stream bed gravels or cobbles were observed. The culvert installation component of the project would restore hydrologic connectivity across the BPA access road, which would have mid- to long-term beneficial impacts to water quality in the watershed, reducing the potential for erosion and sedimentation into the drainage.

Based on culvert design and excavation models, potential impacts to waters of the state and waters of the U.S. from culvert installation would not meet the thresholds requiring notification and authorization from Oregon Dept. of State Lands under the Oregon Removal Fill Law, or U.S. Army Corps of Engineers under the Clean Water Act, Section 404. The project would be covered for Clean Water Act compliance under the non-notifying Nationwide 12 permit.

Chief Creek is not listed as a fish-bearing stream in state and Federal databases. The project is not located within the floodplain.

For the Jones Canyon-Santiam No. 1 Mile 105 Gate Removal and Replacement Project, no waterways are present in the project area that would be potentially affected by construction activities.

Note:

- Work on the Ashe-Marion No. 2 Mile 179 culvert would be completed during the in-water-work window for the Clackamas River and its tributaries (July 16<sup>th</sup> – August 31<sup>st</sup>).
- BPA would coordinate with the USFS Access Road Engineer to minimize fine sediment associated with blading roads and ditch work. Disturbing vegetation in ditches would be avoided as much as possible.
- No side-cast material is allowed during road work.
- Sediment and erosion control best management practices (BMPs) should be installed prior to ground disturbance to minimize impacts to Chief Creek headwaters.
- If surface water flow is present during culvert installation, work area would be isolated, and flow would be directed around the work area.

6. **Wetlands**



Explanation:

No wetlands or wetland indicator species were identified in the project area during the initial site visit. No National Wetland Inventory wetlands or hydric soils typical of wetlands are mapped in the project area.

7. **Groundwater and Aquifers**



Explanation:

The excavation planned for the project area would not be at a depth that would potentially disrupt groundwater or impact local aquifers.

8. **Land Use and Specially-Designated Areas**



Explanation:

Land use is federally managed forests lands for timber, habitat, and recreation. There are no specially-designated areas present. Existing land use would not be impacted by project activities.

9. **Visual Quality**



Explanation:

The project would have temporary impacts to visual quality associated with soil disturbance and construction activity. Visual impacts associated with ground disturbance would be localized and temporary until revegetation occurs.

10. **Air Quality**



Explanation:

Some dust may be generated due to construction activity. However, dust generation should be minimal due to the scope of the ground disturbance.

11. **Noise**



Explanation:

Some temporary noise may be generated due to construction activity. However, the project is located in a remote area and construction noise would not be significant.

12. **Human Health and Safety**



Explanation:

A site-specific safety plan would be developed by the contractor and implemented during construction.

**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: Not applicable

- 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: Not applicable

- 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: Not applicable

- 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: Not applicable

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**Landowner Notification, Involvement, or Coordination**

Description: BPA designed and planned the project in coordination with USFS Mt. Hood National Forest personnel. BPA would continue close coordination with the USFS in further developing and implementing the project.

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

Signed: /s/ Aaron Siemers  
Aaron C. Siemers, EPR-4  
Environmental Protection Specialist

Date: April 17, 2020