

Holcomb-Naselle Transmission Line Rebuild Project

Final Environmental Assessment

Bonneville Power Administration

DOE/EA-2091

March 2020

This document is the Final Environmental Assessment (EA) for the proposed Holcomb-Naselle Transmission Line Rebuild Project (project). Bonneville Power Administration (BPA) prepared this document as an abbreviated Final EA because there have been no substantial changes to the Proposed Action, alternative, or environmental analysis presented in the Draft EA. This abbreviated Final EA provides changes made to the text of the Draft EA, as well as comments received on the Draft EA and BPA's responses to those comments. This Final EA should be used as a companion document to the Draft EA (DOE/EA-2091, dated August 2019), which contains the full text describing the project, its potential environmental impacts, and mitigation measures to reduce impacts. The Draft EA is available on the project webpage at www.bpa.gov/goto/HolcombNaselleRebuild.

Summary

BPA proposes to replace many of the existing wood-pole transmission structures; replace existing conductors and hardware; replace various other line and substation components; install fiber optic cable on the transmission line; and upgrade the access road system along its existing 21-mile-long, 115-kilovolt (kV) Holcomb-Naselle transmission line. The existing 21-mile Holcomb-Naselle transmission line extends south from BPA's Holcomb Substation about 13 miles before turning west for about 7 miles and then south to BPA's Naselle Substation.

Portions of the Holcomb-Naselle transmission line are in poor condition due to normal deterioration and aging. Due to these conditions, portions of the line have begun to fail in recent months, causing outages and requiring emergency repairs. The age, continuing deterioration, and overall poor condition of the line create the risk of additional outages that would adversely affect power deliveries to BPA's customers in the Pacific County area of Washington. In addition, the existing road system that BPA uses to access the transmission line is in poor condition.

BPA released the Draft EA for public comment on August 7, 2019; the comment period was open until August 22, 2019, to accept comments on the Draft EA. The Draft EA describes the project, its potential environmental impacts, and mitigation measures to reduce those impacts. BPA sent the Draft EA to potentially interested and affected persons, agencies, Tribes, and organizations about the availability of the Draft EA, as well as how to request a copy. For further information regarding the comment period

and comments received, see the section titled “Comments Received on Draft EA and BPA’s Responses” in this document.

Changes to the Draft EA

Changes made to the draft EA include the addition of clarifying language. These revisions are presented below by the chapter and section in which they appear in the Draft EA. New text is underlined and highlighted in blue.

2 Proposed Action and Alternative

2.2 Proposed Action

Replacement of transmission structures

The fourth sentence of the first paragraph on page 8 has been revised as follows:

The Proposed Action would replace approximately 111 of the existing wood-pole structures on this line with new wood-pole structures. This includes all poles for structures within 0.5 miles of Holcomb and Naselle substations. Poles to be replaced, based on condition and age and new ground clearance or loading requirements, would be installed in the same location or within 5 to 10 feet of the existing location (except for structures 10/1 (moved 145 feet north), 10/3 (moved 15 feet south), and 17/4 (moved 20 feet west). The existing holes would be cleaned-out ~~and re-augered~~ with a backhoe to a total depth of 7 to 12 feet (new poles are slightly larger in diameter than the existing poles). Additional soil removed by the backhoe would be placed within 5 feet of pole bases or removed from the site. If the existing hole could not be reused, the structure would be located as close to the existing hole as possible, while avoiding sensitive resources (e.g., wetlands) if practicable. No blasting is anticipated.

Anticipated Construction Schedule

The third paragraph on page 14 has been revised as follows:

The construction schedule would depend on the completion and outcome of the environmental review process, including the duration of regulatory agency reviews, consultations with Tribes, and timing of permit and consultation approvals. Construction work would be done in phases, with construction occurring on more than one structure at a time in each transmission line right-of-way segment. ~~One construction season would be needed to complete the Proposed Action.~~ The current schedule calls for access road work and danger tree removal ~~July~~ May through October 2020 and transmission line from April 2020 through ~~May~~ September 2021 with the majority of work taking place during dry, summer months.

The second bullet on page 14 has been revised as follows:

- Marbled Murrelet: ~~Suitable habitat is located at or between structures 4/1, 5/1 to 5/3, 6/3 to 6/5, and 14/4 to 14/6 and o~~ Occupied habitat is located between structures 13/2 to 13/6. During the nesting period (April 1 to September 23), all construction activities (chainsaw activity, helicopter use, road improvement or reconstruction, culvert replacement or installation, and structure replacement) within 110 yards of suitable and occupied habitat would begin two hours

after sunrise and end two hours before sunset within the nesting period. No helicopter use would be allowed within 50 110 yards of ~~suitable~~ and occupied habitat within the nesting period. However, human presence, staging, and vehicle use of existing heavily used roads can occur during the nesting period without daily timing restrictions as long as no heavy equipment is used.

2.6 Best Management Practices and Mitigation Measures

The fourth bullet in Table 2.3 (page 18) has been revised as follows:

- Contact BPA geotechnical specialists and the underlying landowner if geotechnical issues, such as new landslides, arise during construction.

The ninth bullet in Table 2.3 (page 19) under Water Resources, Floodplains, and Fish has been revised as follows:

- Design culverts (non-fish bearing drainages) for the 100-year storm event to minimize future maintenance needs.

The twelfth bullet in Table 2.3 (page 19) under Water Resources, Floodplains, and Fish has been revised as follows:

- Contain petroleum product spills immediately, ~~and~~ eliminate the source, and deploy appropriate measures to clean and dispose of spilled materials in accordance with federal, state, and local regulations, and contact the BPA Environmental Lead.

The seventeenth bullet in Table 2.3 (page 19) under Water Resources, Floodplains, and Fish has been revised as follows:

- Conduct in-water work between August 1 and September 30 for all tributaries of the Willapa River and between August 1 and September 15 for tributaries of the Naselle River.

The first bullet in Table 2.3 (page 19) under Wetlands has been revised as follows:

- Use temporary equipment mats when working in wetlands in the wet season and only drive vehicles and equipment across wetlands during the dry season.

The third bullet in Table 2.3 (page 20) under Wildlife has been revised as follows:

- Remove danger trees in suitable marbled murrelet habitat and within 110 yards of (~~including from known occupied and suitable marbled murrelet habitat~~) outside the nesting season (April 1 and September 23).

The fourth bullet in Table 2.3 (page 20) under Wildlife has been revised as follows:

- Provide maps of areas (including within 110 yards of known occupied marbled murrelet habitat between April 1 and September 23) to be avoided by helicopters to minimize impacts on wildlife.

The sixth bullet in Table 2.3 (page 20) under Wildlife has been revised as follows:

- Schedule work in suitable (at or between structures 4/1, 5/1 to 5/1, 6/1, 6/3 to 6/5, 13/3 to 13/4, and 14/4 to 14/6) and **within 110 yards of** known occupied (13/4 to 13/6) marbled murrelet habitat during the nesting season (April 1 to September 23) to begin two hours after sunrise and end two hours before sunset; pre-work meetings occurring within two hours of sunrise would occur off-site at a developed location.

The second bullet in Table 2.3 (page 20) under Cultural Resources has been revised as follows:

- Conduct archaeological monitoring in the vicinity of cultural site 45PC247, ~~as well as areas designated as high probability for containing unidentified archaeological resources.~~ **No ground disturbing activities would occur within or near the existing site boundaries for 45PC247. The number of vehicles would be limited within the site and only parked within the existing access road prism.**

The third bullet in Table 2.3 (page 20) under Cultural Resources has been revised as follows:

- Follow BPA's Inadvertent Discovery Procedure which requires that if an inadvertent discovery of cultural resources is made all work in the vicinity would stop immediately and the BPA archaeologist, Washington Department of Archaeology and Historic Preservation (DAHP), affected Tribes, and **Washington Department of Natural Resources (WDNR)**, if applicable, would be notified immediately.

The first bullet in Table 2.3 (page 20) under Other Resources has been revised as follows:

- Place ~~plastic ground covers~~ **absorbent matting** and concrete blocks **or cribbing** to keep wood poles off the ground in material staging yards.

The thirteenth bullet in Table 2.3 (page 21) under Other Resources has been revised as follows:

- Drive vehicles at low speeds (less than **520** miles per hour) on access roads and in the BPA right-of-way to minimize dust.

The twenty-second bullet in Table 2.3 (page 21) under Other Resources has been revised as follows:

- Require that **BPA and all** contractors maintain a clean construction site and remove all construction debris.

3.2 Environmental Consequences

3.2.3 Water Resources, Floodplains, and Fish

Proposed Action

Streams

The second sentence of the fourth full paragraph of Section 3.2.3 (page 32) has been revised as follows:

About 2.8 miles of direction of travel road use would occur in these shoreline designations plus those along the Willapa River and Salmon Creek; no road improvement would occur for

direction of travel roads **except for two culvert replacements in line miles 4 and 19**. Because BMPs would be used to minimize sediment runoff to streams, travel on roads would result in a **low** impact on water resources.

3.2.6 Cultural Resources

Proposed Action

The third sentence of the third paragraph of Section 3.2.6 (page 38) has been revised as follows:

Cultural site 45PC247 is located in and around an existing structure and has been disturbed by the previous construction and maintenance of the line. The existing structure is not proposed for replacement and access road work would not occur in the site boundaries. To prevent temporary disturbance to the site, all vehicles and equipment would be parked ~~outside the site boundary east of the structure~~ **within the existing access road prism. Additionally, the number of vehicles would be limited within the site.** Site boundaries would be marked for avoidance prior to construction and the right-of-way would be blocked by flagging to prevent disturbance to the site. Impacts on this site would be **none-to-low** with cultural monitoring during construction to ensure implementation of avoidance measures.

Comments Received on Draft EA and BPA's Responses

To solicit comments on the Draft EA, a notice of its availability or a copy of the Draft EA was e-mailed or mailed to 102 potentially interested and affected persons, agencies, Tribes, and organizations. In addition, BPA posted the Draft EA on the project website. The comment period ran from August 7 to August 22, 2019, with two comment letters and one phone call received.

Comment letters/calls were numbered consecutively as they were received, as shown. Comment letter/call numbers and the associated author and affiliation are summarized below. In each comment letter/call, individual comments have been numbered. The comments contained in these letters are then reproduced by comment letter, with responses to each letter's comments immediately following.

Comment Number	Commenter
HNLRB19190001	Nelson, private citizen
HNLRB19190002	Gradt, private citizen
HNLRB19190003	Goss, Washington State Department of Natural Resources

Comment HNLRB19190001: Nelson

0001-1 Will this project impact my properties in Naselle?

Response to Comment HNLRB19190001: Nelson

0001-1 Ms. Nelson's properties are not located along the Holcomb-Naselle transmission line or its access roads so no impact would occur.

Comment HNLRB19190002: Gradt

0002-1 Just rebuild the damn thing and quit wasting money on all the mailing stuff and meetings. This should've been done sooner. If this system needs a rebuild, just do it.

Response to Comment HNLRB19190002: Gradt

0002-1 Comment noted.

Comment HNLRB19190003: Washington Department of Natural Resources

0003-1 There does not appear to be anything in the EA about the bridge in P&E that BPA was planning to replace at the time of the field tour with DNR a few years ago. Is it still planned to replace the bridge?

0003-2 The stream culvert in mile 18 that was looked at on the field tour a few years ago is not in the culvert layer. Is the being replaced with this project, and if not, what is the plan for that pipe?

0003-3 Marbled murrelet survey data should be included in the final BA. Since there were no detections, DNR is asking that the data include the target stands, station locations, and how many visits per target stand occurred per year.

0003-4 If any wetlands are impacted by tower replacement or pulling and tensioning site on DNR managed lands please work with DNR staff to ensure wetland policy and procedure are followed.

0003-5-1 DNR has a timber sale, Trapper Keeper, scheduled to sell January 2020. There could be conflict with work being done because our timelines are similar. The road work for this timber sale will likely happen summer of 2020, with the contract expiring October 2021.

0003-5-2 Cu 20 is shown as a 36" pipe in a perennial stream. Per DNR stream typing with Trapper Keeper timber sales, there is no stream there. DNR would prefer to not have a 36" pipe at this location.

0003-5-3 The Trapper Keeper timber sale will be blocking that road, which will affect BPA's access. DNR plans to abandon the A-223 with this timber sale. This road is listed as one of the BPA direction of travel roads.

0003-6 Page 9: "The height of the replaced wood-pole structures would be...ranging from 45-95 feet above ground depending on terrain, requirements for road crossings." Will BPA be discussing these requirements for road crossings with DNR?

0003-7 Page 12:"For the joint-use roads located on state trust lands, BPA is consulting with DNR regarding road standards." Has this occurred?

0003-8 Page 12: What is the location of the 90 feet of access road reconstruction in line mile 6?

0003-9 Page 18: BMPs state, "Contact BPA geotechnical specialists if...new landslides arise." In this event, DNR should be contacted as well.

0003-10 Page 18: BMPs state that BPA will “Flag rare plant populations in line mile 13.” Have or will DNR biologists be involved in that process?

0003-11 Page 19: BMPs state, “Install cross-drains per BPA access road design specifications.” DNR would like a copy of those specifications.

0003-12 Page 19: BMPs state that BPA will prepare a SWPPP. DNR would like a copy of that.

0003-13 Page 20: BMPs state BPA will provide a construction schedule to all landowners. When can DNR expect to receive that schedule?

0003-14 Page 32: Please provide designs for the fish crossings structures in line mile 4. DNR would like to confirm BPA’s stream typing, particularly of the two fish streams and Culvert 29.

0003-15 Page 32: It is unclear where the document states “no road improvement would occur for direction of travel roads” whether it is referring to all directions of travel roads, or just those along the Willapa River and Salmon Creek. There are two culverts in the layer (on the A-223 and the E-100) that are on direction of travel roads.

0003-16-1 Page 32: For direction of travel roads, the document states “BMPs would be used to minimize sediment runoff.” How does BPA intend to utilize BMPs without road improvement?

0003-16-2 The table does not show BMPs for adding rock to a road. This is what the D-Line in Radar Ridge needs in order to prevent sediment delivery if significant haul occurs on it.

0003-17-1 The BPA worked closely with State Lands DNR on the development of this project and has incorporated recommendations made by State Lands DNR.

0003-17-2 One additional suggestion is to provide environmental monitors when work is being done within or directly adjacent to occupied sites on DNR-managed lands to ensure on-site that impacts are minimalized.

0003-18 The BPA plans to minimize use of helicopters in and adjacent to occupied sites with no helicopters within 50 yards of an occupied site during the nesting season. DNR generally recommends not allowing helicopters within 330 feet of an occupied site by distance or altitude during the nesting season. Please consider changing the distance to 330 feet from an occupied site unless the 50 yards is a recommendation of the USFWS.

Response to Comment HNLRB19190003: Washington Department of Natural Resources

0003-1 The bridge reference by WDNR was replaced in 2018 as part of BPA’s Holcomb-Naselle No. 1 Bridge Replacement Project.

0003-2 BPA is not proposing to replace culverts in line mile 18. However, a culvert is proposed for replacement along the access road to structure 19/1 at the west end of line mile 18. This culvert is shown in the access road data that have been provided to WDNR for their review.

0003-3 Marbled murrelet survey information has been provided to WDNR via the biological assessment (BA) BPA prepared as part of the Endangered Species Act consultation with USFWS. The BA includes

information on target stands, station locations, and the number of visits per target stand that occurred during protocol surveys in 2018 and 2019.

0003-4 There are no wetlands located at structures or pulling and tensioning sites on WDNR-managed lands.

0003-5-1 BPA would work with WDNR and their timber sale contractor to make sure access road use conflicts are minimized during construction.

0003-5-2 During stream surveys, BPA also did not identify a stream where culvert 20 is located. However, replacement of the culvert within the access road drainage area is needed to provide long-term access by large construction equipment and for operation and maintenance of the transmission line. Removal of the culvert would restrict access to line mile 4.

0003-5-3 WDNR has agreed to amend their plan to abandon the road so that BPA can use the road during reconstruction and operation and maintenance of the transmission line.

0003-6 BPA has discussed conductor height with regard to road crossing requirements with WDNR.

0003-7 BPA has consulted with WDNR regarding the use of joint-use roads located on WDNR-managed lands.

0003-8 About 90 feet of access road reconstruction would occur along the access road to structure 6/4 on WDNR-managed lands.

0003-9 BPA would contact underlying landowners including WDNR if landslides occur during construction. Text has been added to the fourth bullet in Table 2.3 (page 18) in Section 2.6 of the EA to address this request.

0003-10 BPA consulted with Walter Fertig, WDNR State rare plant botanist, regarding rare plant population survey conducted on WDNR-managed lands. Three patches of *Erythronium revolutum* (pink fawn-lily) were identified along line mile 13. All three patches are in areas that would be flagged for avoidance during access road or other construction work so no impact would occur.

0003-11 BPA would provide access road design specifications to WDNR for those roads located on WDNR-managed lands.

0003-12 BPA would provide the Stormwater Pollution Prevention Plan to underlying landowners including WDNR, if requested.

0003-13 Page 20: As stated in Section 2.2 of the EA, BPA would conduct access road work and danger tree removal June through October 2020 and transmission line work from April 2020 through September 2021. BPA would provide notification of construction and a schedule of activities to all underlying landowners prior to the start of work.

0003-14 BPA consulted with Noelle Nordstrom, former WDNR Fish and Wildlife Biologist, regarding the typing of fish streams located on WDNR-managed land. Ms. Nordstrom confirmed that the two unnamed streams in line mile 4 are fish streams. BPA would replace the culverts located on these streams with fish passage culverts. The fish passage culvert designs have been provided to WDNR for their review. According to WDNR's stream typing data, the unnamed water body where existing culvert 29 would be replaced is a non-fish stream. Ms. Nordstrom did not modify this stream's typing.

0003-15 Text in the fourth full paragraph of Section 3.2.3 of the EA (page 32) refers to direction of travel roads in shoreline areas of all streams in the project area including the Willapa River and Salmon Creek. The commenter is correct that culvert 20 (along a direction of travel road to line mile 4) and culvert 46 (along a direction of travel road to structure 19/1) are proposed for replacement. Text in Section 3.2.3 Water Resources, Floodplains, and Fish has been modified to show that all direction of travels roads except those to line mile 4 and structure 19/1 would not require road improvement.

0003-16-1 Use of BMPs as stated in the fourth full paragraph of Section 3.2.3 of the EA (page 32) refers to BMPs listed in Table 2.3. Two of the BMPs listed include conducting project construction during the dry season to minimize erosion, compaction, and sedimentation and restricting construction vehicles and equipment to access roads and designated work areas.

0003-16-2 Addition of rock for access road improvement would be included in the construction specifications for the project and not in Table 2.3 Best Management Practices and Mitigation Measures for the Proposed Action. BPA would work with WDNR to determine access road work needed in line mile 18.

0003-17-1 Comment noted.

0003-17-2 BPA plans to provide environmental monitoring in sensitive areas during construction including marbled murrelet occupied habitat on WDNR-managed lands.

0003-18 BPA, in consultation with USFWS and WDNR, would restrict helicopter use within 110 yards (330 feet) of occupied marbled murrelet habitat during the nesting season (April 1 to September 23) per WDNR's request unless otherwise specified by USFWS.