

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Big Cliff PH - Detroit PH No. 1 & 2 Miles 1-3 Road and Trail Improvement Project

**PP&A No.:** 4,148

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

**Location:** Marion County, OR

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

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) owns and operates the Big Cliff PH-Detroit PH No. 1 & 2 13.8 kV transmission line. The transmission line runs along the southern shores of Big Cliff Reservoir on the Santiam River, from Big Cliff Dam to Detroit Dam. BPA transmission line maintenance crews access the transmission line right-of-way for periodic inspections and repairs through a series of roads and trails. BPA plans to improve approximately 3 miles of roads and trails along the line, and install drainage features to upgrade and in some areas re-establish access to the transmission line structures. Improvements would include:

- grubbing to remove ground vegetation
- reconstruction of degraded trail footprint
- regrading and blading
- addition of surface rock
- installation of water bars and drain dips
- construction of landings
- stair and gate installation
- construction of two approximately 20 ft. long bridges over unnamed streams

While approximately one mile of grubbing to remove ground vegetation, with some re-grading, would be necessary to improve and re-establish the trails in the most degraded sections, no new road footprint would be constructed, and no large trees would need to be removed for the project. Disturbed soils would be stabilized and seeded upon project completion. Construction equipment would likely include dump trucks, back-hoe, front end loaders, mini-excavators, all-terrain-vehicles, and powered wheel barrows.

**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

*/s/ Sarah T. Biegel*

Sarah T. Biegel, Date:           Date: September 2, 2020  
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:** Big Cliff PH - Detroit PH No. 1 & 2 Miles 1-3 Road and Trail Improvement Project

### **Project Site Description**

The Big Cliff PH - Detroit PH No. 1 & 2 Miles 1 - 3 Road and Trail Improvement Project is located in the Cascades of central Oregon, near the southern banks of the Santiam River and Big Cliff Reservoir, in the Western Cascades Lowlands and Valleys ecoregion. The ecoregion is characterized by mild, wet winters and thick forests of western hemlock and Douglas-fir, as well as relatively high-gradient streams and rivers that in some locations support endangered salmon and bull trout.

In the project area, the Big Cliff PH - Detroit PH transmission line right-of-way (ROW) runs generally parallel to the Big Cliff Reservoir. The transmission line was built on the northern facing mountain slopes of the Santiam River valley. The transmission line is approximately 75 – 150 linear ft. south of the reservoir, and approximately 75 - 150 ft. higher in elevation. The vegetation within the transmission right-of-way (ROW) is cleared periodically of trees to maintain safety and reliability standards. The ROW supports native shrubs and other vegetation such as sword fern, lady fern, as well as invasive species such as foxglove, Himalayan blackberry, oxeye daisy, and Scotch broom. The gradient of the greater project area is rather steep, with slopes up to approximately 45-75% in some locations; however, the former access road and trail system, as well as the transmission right-of-way, in many sections of the project area, was cut and benched from the slope during construction. This benching along the slopes has resulted in emergence of several groundwater seeps that have formed wetlands in the project area. In addition to the wetlands, the trail crosses several small, unnamed streams that drain the northeast facing slopes of the mountainside.

### **Evaluation of Potential Impacts to Environmental Resources**

#### **1. Historic and Cultural Resources**

Potential for Significance: No

**Explanation:**

BPA developed an area of potential effect (APE) for the proposed project and on June 24, 2020, initiated consultation with the Oregon State Historic Preservation Office, the Confederated Tribes of the Siletz Indians, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Grand Ronde Community of Oregon, the Oregon Department of Forestry, the U.S. Forest Service, and the U.S. Army Corps of Engineers. BPA conducted a review of existing archaeological records in and near the APE as well as completed a field survey. On July 29, 2020, BPA made a

determination that the proposed undertaking would have no adverse effect on historic and cultural properties. In correspondence near the end of August 2020, The Confederate Tribes of the Grande Ronde, the U.S. Army Corps of Engineers, and the Oregon State Historic Preservation Office concurred with BPA's determination.

Notes:

- In the unlikely event of inadvertent discovery of cultural or historic resources during project activities, all work would immediately stop until the resources can be evaluated by BPA archaeologists and additional consultations with the appropriate parties are completed as necessary.

## **2. Geology and Soils**

Potential for Significance: No

Explanation:

Certain parts of the planned construction would occur on pre-existing, established road and trail footprint. However, the project would also require approximately one mile of trail regrading in locations where the footprint has significantly degraded. Any rock cuts would be stabilized on site in a manner to reduce the risk of rock slide. Disturbed soils would be stabilized with straw or other acceptable erosion and sediment control methods, and seeded with a native seed mix.

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

Potential for Significance: No

Explanation:

Regrading the roads and trails with heavy machinery would likely disturb adjacent vegetation, including native grasses, ferns, and forbs, as well as invasive plants. These areas would be reseeded with native grasses post construction.

BPA obtained a species list for the project area from the US Dept. of Fish and Wildlife (USFWS). An effects determination was conducted for Kincaid's lupine, Bradshaw's desert parsley, Nelson's Checkermallow, and Willamette daisy. BPA determined that the project would have no effect on special-status plants and habitat. Please review the project's Effects Determination Memo for more information.

## **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 surrounding forest provides ample cover and habitat for wildlife.

BPA obtained a species list for the project area from the US Dept. of Fish and Wildlife. An effects determination was conducted for Fisher and Northern spotted owl. BPA determined that the project would have no effect on special-status wildlife and habitat. Please review the project's Effects Determination Memo for more information.

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

Potential for Significance: No with Conditions

### Explanation:

The project area is not located in or near a floodplain.

No in-water work is planned in ESA-listed fish streams. One ESA-listed fish stream crosses the BPA access road with a ford crossing on the western side of the work area. No work is planned for this crossing, and it would be protected during construction to ensure activity does not degrade the ford and impact water quality. The Santiam River is also ESA-listed, and located approximately 75-150 linear feet north-northeast of the work areas, but the work area is separated by approximately 75 - 150 feet of elevation, and no work is planned in the Santiam River. BPA has determined that the project would have no effect on ESA-listed fish and designated critical habitat.

In the spring of 2020, BPA initiated a wetland and waterway survey to map and characterize wetlands and waterways in the project area. A total of seven intermittent and perennial waterways were identified and mapped. Work is planned in and near several of these waterways, including installation of drain dips and foot bridges. BPA reviewed planned work for compliance with Section 404 and Section 401 of the Clean Water Act (CWA), as well as the Oregon Removal Fill Law (OR RF Law). Some components of the planned work within waters of the U.S. and State would qualify under maintenance exemptions within the respective laws, which authorize BPA to conduct routine maintenance within jurisdictional waters on currently serviceable access roads and trails. In other instances, for example foot bridge installation at two perennial waterways, no impacts would be planned within the ordinary high water mark of the waters. For remaining waters where work is planned that does not qualify for maintenance exemptions, BPA would limit construction activity to not reach notification or permitting impact thresholds. All work in waters of the U.S. would be permitted under a non-notifying Nationwide 12 CWA permit.

### Notes:

- In-water work would be conducted in the low-flow summer or early fall season, if possible.

## 6. Wetlands

Potential for Significance: No with Conditions

### Explanation:

In a substantial section of the project area, the transmission line right-of-way, access road, and trail system was cut into the north facing slopes of the Santiam River valley during the construction of Big Cliff Dam and the Big Cliff PH - Detroit PH No. 1 & 2 transmission line, forming a localized bench-like structure on the topography. Groundwater seeps emerge at this juncture, and spread along the bench-forming wetlands before draining down toward Big Cliff Reservoir.

In the spring of 2020, BPA initiated a wetland and waterway survey to map and characterize wetlands and waterways in the project area. A total of four wetlands were identified and mapped. Work is planned in and near several of these wetlands, including maintaining existing roads and trails, and re-establishing trail footprint that is no longer serviceable. BPA reviewed planned work for compliance with Section 404 and Section 401 of the Clean Water Act (CWA), as well as the Oregon Removal Fill Law (OR RF Law). Some components of the planned work within waters of the U.S. and State would qualify under maintenance exemptions within the respective laws, which authorize BPA to conduct routine maintenance within jurisdictional waters on currently serviceable access roads and trails. For remaining wetlands where work is planned that does not qualify for maintenance exemptions, BPA would limit construction activity to not reach notification or permitting impact thresholds. For instance, to comply with the permitting thresholds of the OR RF Law, total regulated removal and fill within wetlands and

waterways on the entire project would not meet or exceed 50 cubic yards. All work in waters of the U.S. would be permitted under a non-notifying Nationwide 12 CWA permit.

Notes:

- All work that would impact wetlands but meets the maintenance exemptions of the CWA and OR RF Law would not exceed 20% of existing impact footprint and/or volume. Impacts to these wetlands would be minimized as much as possible.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation:

Groundwater seeps in the project area emerge as wetlands and waterways in and near certain sections of the access roads and trail due to the historical cuts along the north-facing slopes of the Santiam River valley during construction of the Big Cliff Dam and the transmission line. Other than that observation, excavation and grading would not be at depths that would impact or intersect aquifers and/or groundwater.

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

Potential for Significance: No

Explanation:

Current land use is transmission line easement and wildlife habitat. The project area is owned and managed by the U.S. Army Corps of Engineers (USACE), associated with the Big Cliff and Detroit hydroelectric dams which the USACE operates. The project would not impact current land use. No specially-designated areas are present in the project area.

## **9. Visual Quality**

Potential for Significance: No

Explanation:

The project area is remote and access is controlled. Road improvements are proposed for existing, established road footprint and the project would not significantly change existing visual quality. Trail improvements and reconstruction would involve some vegetation removal and grubbing. Impacts would be minor and limited to the approximately 4 foot wide trail width.

## **10. 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.

## **11. Noise**

Potential for Significance: No

Explanation:

Some noise may be generated due to construction traffic, transport and placement of rock, and general construction activities. However, the project area is in a remote location and any noise generated would be temporary.

## 12. Human Health and Safety

Potential for Significance: No

Explanation:

The construction contractor would develop a Site Specific Safety Plan to address potential risks to worker health and safety and mitigate those risks. The area is closed to the public so public safety would not be a concern.

### 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: Please add language here.

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      Date: September 2, 2020  
Physical Scientist (Environmental) – EPR-4