Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



<u>Proposed Action:</u> Ross-St. John's No.1 and Ross-Rivergate No.1 Transmission Line Insulator Replacement Project

Project No.: P02237

Project Manager: Mark Nadeau, TEP-TPP-1

Location: Clark County, Washington & Multnomah County, Oregon

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):</u> B4.6 Additions and modifications to transmission facilities.

<u>Description of the Proposed Action:</u> Bonneville Power Administration (BPA) proposes to replace some of the equipment on the existing, double-circuit 230-kilovolt (kV) Ross-St. Johns No.1 and Ross-Rivergate No.1 transmission line in Clark County, Washington, and Multnomah County, Oregon. The 7-mile long, double-circuit 230-kV transmission line consists of 41 total steel-lattice transmission towers in a shared transmission right-of-way (ROW) that crosses the Columbia River. The proposed project would replace all existing porcelain and glass insulator assemblies with new standardized ceramic insulator assemblies, replace the existing overhead ground wires (OHGW), and install fall protection equipment.

The proposed action would include the following activities:

- Replace all porcelain and glass insulator assemblies with new ceramic insulator assemblies and fittings.
- Replace the existing, double OHGW that provides lightning protection.
- Install fall protection to each lattice tower that lacks existing fall protection.
- Install bird diverter devices in areas with potentially high avian use.
- Maintain access roads along the corridor.
- Staging areas, helicopter landing zones, and pulling and tensioning sites.
- Temporary mobile guard structures for stringing OHGW over roads and other utilities.
- Conduct vegetation maintenance along the transmission line ROW and access roads.

Helicopters would be used on portions of the line to pick up and drop off insulator assemblies and workers at structures, attach the conductors to the assemblies, and install bird diverters. Helicopter use would occur along approximately one mile of the line corridor in Oregon and approximately 4.2 miles in Washington.

Three temporary laydown/fly yards totaling approximately seven acres would be used to support proposed project activities. Two of the yards are in cleared and rocked areas while the third is in an agricultural field which would be mowed prior to use. The OHGW would be replaced by connecting the new OHGW onto the existing wire to pull it into place, requiring eleven pulling and tensioning locations totaling approximately six acres. For safety purposes, temporary mobile

guard structures would be placed along the ROW when performing work over a road or utility crossing to prevent the OHGW from sagging into traffic.

Improvements including blading, shaping, grading, brushing, and placing surface rock on existing road prisms would be required on approximately 0.7-miles of access roads within the previously disturbed area. No new access roads would be constructed as part of the proposed action.

Removal or disturbance of low-growing vegetation in previously-disturbed areas for laydown areas, fly yards, and access road work is estimated to cause up to 16 acres of temporary ground disturbance.

<u>Findings:</u> In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 Federal Register [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 Code of Federal Regulations (CFR) 1021, Subpart D (see attached Environmental Checklist);
- 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 (CX).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Douglas Corkran
Douglas Corkran, ECT-4
Environmental Protection Specialist

Concur:

<u>/s/ Sarah T. Biegel</u>
Sarah T. Biegel
NEPA Compliance Officer

November 29, 2023
Date

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.

<u>Proposed Action:</u> Ross-St. John's No.1 and Ross-Rivergate No.1 Transmission Line Insulator Replacement Project

Project Site Description

The proposed action would occur within the existing, shared transmission line ROW corridor extending from the Ross Substation in Clark County, Washington to the St. John's Substation in Multnomah County, Oregon. The seven-mile project ROW corridor crosses a relatively flat urban and rural landscape over mostly disturbed areas from historical and current land uses. The Oregon portion of the transmission line corridor crosses the Smith and Bybee Wetlands Natural Area and the former, closed St. John's Landfill site. The project crosses private and public property where land use is primarily industrial, commercial, agricultural, residential, and open space. Project work areas would be within the previously-disturbed and developed ROW.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No, with conditions

Explanation: A records search and review of cultural resources and archaeological and historic built environment field surveys were performed within the proposed action's area of potential effects (APE). These reviews found that historic and cultural resources were present in the project area, but since sensitive sites would be avoided, no adverse effects would occur to them. On May 16, 2022, BPA defined the area of potential affects (APE) in accordance with 36 CFR 800.4, in consultation with the Oregon State Historic Preservation Office (SHPO), Washington Department of Archaeology and Historic Preservation (DAHP), the Cowlitz Indian Tribe, The Confederated Tribes of the Grand Ronde, the United States Fish and Wildlife (USFWS), the Washington Department of Fish and Wildlife, and the Washington State Department of Transportation.

On July 19, 2023, BPA determined, per 36 CFR 800.4(d)(1), that this would have no adverse effect to historic properties. Washington DAHP issued concurrence with BPA's determination on July 19, 2023. No response was received from the Oregon SHPO Officer or consulting Indian Tribes.

Notes:

One archaeological site must be avoided and protected during construction. Avoidance and
protection measures for this site would be included in the Project Mitigation Implementation
Table (MIT) and corresponding construction materials, including restrictions on road
improvements, use of matting, and other measures. Project construction would proceed
under BPA's Post-Review Discovery Procedures.

2. Geology and Soils

Potential for Significance: No

<u>Explanation</u>: Vehicles and equipment could cause soil compaction and disturbance, but they would primarily be used on previously- disturbed roads. Disturbance from road improvement and

reconstruction activities may occur but would also only be on previously-disturbed land. Any excess spoils generated during project activities would be hauled off site to an approved location. Standard construction best management practices (BMPs) would be implemented, including dust, erosion, and sediment controls; and spill prevention plans.

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

Potential for Significance: No, with conditions

Explanation: The proposed action activities would occur within the existing, disturbed transmission line ROW. Two ESA-listed threatened plant species, golden paintbrush (*Castilleja levisecta*) and Nelson's checkermallow (*Sidalcea nelsoniana*), have the potential to be present in the project area. In May 2022, qualified biologists surveyed the project area for the presence or absence of ESA-listed and state-listed plant species. Surveys did not identify any ESA-listed or state-listed plant species present in the proposed project area. Due to the lack of suitable habitat in the action area and the distance to the nearest known populations of both species, it was determined that the proposed action would have no effect on ESA-listed golden paintbrush or Nelson's checkermallow.

The ROW is dominated by weeds, with over 75 percent of all surveyed work areas having at least one weed species present. Native plant species were only observed in about half of all surveyed work areas. The closed St. John's Landfill has been revegetated and remediated to support prairie habitat; therefore, it has a greater diversity of plant species compared to the other portions of the ROW. However, suitable habitat for golden paintbrush and Nelson's checkermallow were not observed within the action area of the St. John's Landfill. While no Federal- or state-listed plant species would be impacted by the proposed action, temporary impacts to existing vegetation may occur from vehicles and equipment crushing plants in work areas.

Notes:

Measures to minimize vegetation removal, the spread of noxious weeds, and revegetate
temporarily impacted areas have been incorporated into the proposed action and would be
included in the project MIT for construction. Temporarily disturbed areas would be
reseeded and returned to pre-existing conditions following completion of the proposed
action. Standard construction BMPs would require restoration or stabilization of disturbance
areas, as appropriate.

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

Potential for Significance: No, with conditions

Explanation: The proposed action activities would occur within the existing, disturbed transmission line ROW. Threatened and endangered species with potential to occur in the area include the Columbian white-tailed deer (Odocoileus virginianus leucurus), northern spotted owl (Strix occidentalis caurina), streaked horned lark (Eremophila alpestris strigata), yellow-billed cuckoo (Coccyzus americanus), and bull trout (Salvelinus confluentus). In May 2022, qualified biologists surveyed the area and did not observe the ESA-listed species within the action area.

The proposed action area is within the current range of the Columbian white-tailed deer and there is suitable habitat for the yellow-billed cuckoo. While, neither species has been observed in the action area, if these species are present during helicopter activities, they may be disturbed by elevated noise. Therefore, it was determined that the proposed action may affect, but is not likely to adversely affect, the Columbian white-tailed deer and yellow billed cuckoo. There will be no effect to yellow-billed cuckoo designated critical habitat.

Suitable streaked horned lark habitat was observed within the project corridor, and they are documented to occur within the action area. Temporary disturbance may occur from noise and ground-disturbing activities, but no permanent habitat disturbance would occur.

Therefore, the proposed action may affect, but is not likely to adversely affect, the streaked horned lark. The proposed action would have no effect on streaked horned lark designated critical habitat.

There is limited forested habitat in proximity of the proposed action area; therefore, it does not support nesting, foraging, or dispersal for the northern spotted owl. Therefore, it was determined that the proposed action would have no effect on northern spotted owl or northern spotted owl designated critical habitat. USFWS concurred with these determinations for ESA-listed species in a letter dated June 8, 2023.

While conducting the spring 2022 field surveys, five active eagle nests, three inactive eagle nests, two active red-tailed hawk nests, three active osprey nests, and an active egret and heron colony were observed. All nests, except one active osprey nest, were observed in Oregon. While the active eagle nests were not within the ROW, the inactive nests and the buffer areas for two of the active nests intercept it. The egret and heron colony is within the ROW. Osprey nest and buffers are near the edge of the ROW, and the red-tailed hawk nests are outside of the ROW.

Notes:

• A construction timing restriction for streaked horned lark from March 15 to August 15 would be implemented within areas of suitable streaked horned lark habitat. Due to the presence of active nests within the project area, construction activities would have the following restrictions: all construction would be avoided within 0.25 miles of active bald eagle nests from January 1 to August 31; within 0.25 miles of the active egret/heron colony from February 15 to July 31; and within 600 feet of active osprey nest trees or perch trees from March 1 to September 1. The project proposes to install bird diverter devices in areas with potentially high rates of avian use, reducing the potential for future impacts from continued operation of the transmission line.

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

Potential for Significance: No, with conditions

Explanation: The proposed action transmission line crosses the Columbia River and the lower Columbia River Slough. The Columbia River supports fish species protected under the ESA, including bull trout (*Salvelinus confluentus*), steelhead trout (*Oncorhynchus mykiss*), Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*Oncohynchus kisutch*), and chum salmon (*Oncorhynchus keta*). The Columbia River is designated critical habitat for bull trout, steelhead trout, and Chinook, coho, and chum salmon. The lower Columbia River Slough also supports federally-listed salmonids and is designated critical habitat for Chinook salmon and steelhead trout. However, no riparian habitat, water bodies, floodplains, or fish-bearing streams would be directly affected by the proposed action, and standard construction BMPs would prevent indirect impacts to water bodies, floodplains, and special-status fish. Therefore, the proposed action would not impact water bodies, riparian habitats, and floodplains; and would have no effect on ESA-listed fish species and designated critical habitat.

The National Marine Fisheries Service (NMFS) agreed with the finding of effects and confirmed that the proposed work is consistent with the 2016 biological opinion (WCR 2014—1600/WCRO 2014-00007, SLOPES for BPA Transmission line and road Access carried out by the BPA in Oregon, Washington, and Idaho) and would not require compensatory mitigation in an email dated June 6, 2023.

Notes:

• Construction BMPs to reduce impacts from runoff or sedimentation to aquatic resources would be implemented. Helicopter landing and refueling zones would not be placed within

150 feet of streams, wetlands, or floodplains. At least one spill kit would be on site prior to helicopter refueling. Crews would perform spill prevention methods to mitigate the effects of inadvertent fuel release onto the ground during refueling.

6. Wetlands

Potential for Significance: No, with conditions

Explanation: A wetland delineation survey was conducted in May 2022. The survey identified wetlands within the proposed action ROW and work areas. Based on the survey results, project design was modified to avoid and minimize potential for impacts to wetlands or waters.

Notes:

Measures to minimize and avoid potential impacts to wetlands and waters have been
incorporated into the proposed action and would be included in the project MIT for
construction. Construction is proposed to occur during the dry season and would
incorporate the following additional BMPs to avoid sensitive areas, including flagging
boundaries, using existing access roads, and construction matting, where needed.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance is expected to be minor for the proposed action and runoff conditions minimal. Ground disturbance is unlikely to reach depths to groundwater, and no new wells or other uses of groundwater or aquifers are proposed. Standard construction BMPs would reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater or aquifers. If a spill does occur, it would be cleaned immediately and disposed of at the appropriate off-site facility. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The proposed action could temporarily impact nearby residential, recreational, agricultural, commercial, and industrial land uses due to construction noise, access restrictions, increased construction traffic, and ground disturbance. All work would be within the existing BPA fee-owned property or within the existing transmission line ROW and along existing access roads. The proposed action would be consistent with current surrounding land uses and no permanent changes in land use would occur on BPA-fee owned property or along the existing transmission line ROW. The proposed action area crosses a specially-designated area, the Smith and Bybee Wetlands. Helicopters would be used in this area (structures 6/4 – 7/2) to eliminate ground disturbance. Therefore, the proposed action would not impact land use or specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: During construction, the presence of construction equipment and general construction activities, including vegetation disturbance, would cause temporary visual impacts. The proposed insulator replacements are similar in size and appearance to existing equipment, and they would not have a noticeable impact on the baseline visual quality at the site. Therefore, the proposed action would not impact visual quality.

10. Air Quality

Potential for Significance: No

<u>Explanation</u>: The proposed action would cause a minor and temporary increase in dust and emissions in the local area from general construction activities. Standard construction BMPs would suppress dust. There would be no long-term change in air quality after construction of the proposed action is completed.

11. Noise

Potential for Significance: No

Explanation: During construction and insulator replacement, the use of vehicles, helicopters, equipment, and the performance of general construction activities would temporarily and intermittently produce noise at levels higher than current ambient conditions. Construction-related noise could be audible from properties located near the transmission line, including recreational, residential, commercial, agricultural, and industrial properties. There would be no long-term change in ambient noise following completion of the proposed action.

12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed throughout proposed action construction, and standard construction BMPs would minimize risk to human health and safety. The installation of fall protection and guard structures would provide additional safety measures for construction crews and the public. Therefore, the proposed action would not be expected to impact human 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

<u>Description</u>: The proposed action would primarily occur on the existing, operating BPA transmission line ROW. However, sections of the ROW and some ROW access roads intersect private property. BPA would notify and coordinate with landowners prior to the start of construction.

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

Signed: /s/ Douglas Corkran November 29, 2023

Douglas Corkran, ECT-4 Date

Environmental Protection Specialist