

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Ice Age Drive Extension Crossing Keeler-Oregon City No. 2 Transmission Line Corridor

**Project No.:** LURR-20230151

**Project Manager:** Darin Smith, TERR-CHEMAWA

**Location:** Washington County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow the City of Sherwood (City) to install a new east-west collector roadway across BPA's fee-owned right-of-way (ROW) between structures 20/3 and 20/4 on the Keeler-Oregon City No. 2 transmission line. The plan also includes water, sewer, storm, and private utilities, as well as a new stormwater facility. The City of Sherwood is constructing the new roadway to facilitate development in the area. The project is located in Sherwood, Washington County, Oregon (Township 2 South, Range, West, Section 28).

The project includes constructing a new two-lane paved roadway with sidewalks on both sides of the roadway. Construction of the proposed road would require grading and compacting soils for the roadbed and permanently laying an asphalt roadway and concrete multi-use paths on both sides of the roadway. The proposed roadway would result in approximately 8,000 square feet (0.18 acres) of permanent impacts within BPA ROW. A joint utility trench would be placed along the southeastern side of the proposed roadway resulting in 400 square feet of temporary impacts. The utility trench would be approximately four feet deep and four feet wide resulting in 400 square feet of temporary impacts. A stormwater facility would be constructed north of the proposed road with a majority of the facility constructed outside of the BPA fee-owned ROW. Approximately 7,000 square feet (0.16 acres) would be constructed within the ROW with a maximum excavation depth of six feet. The stormwater facility would be required to treat stormwater runoff from the new impervious surface of the roadway.

Graded and excavated soils would be used for backfill and/or disposed of off-site in accordance with all applicable local, state, and Federal regulations. The project would require the use of a dump truck, excavator, flatbed trailer, ready mix truck, and asphalt paving equipment.

**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.

Jeremy Doschka  
Environmental Protection Specialist

Concur:

Sarah T. Biegel  
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:** Ice Age Road Extension Crossing Keeler-Oregon City No. 2 Transmission Line Corridor

## **Project Site Description**

The project area is located on BPA fee-owned ROW within the Keeler-Oregon City No. 2 transmission line corridor. The surrounding land use is zoned for industrial. The ROW is flat and vegetation is dominated by non-native grasses and forbs with several larger trees located on the southwestern edge of the ROW. There are no wetlands or water bodies present within the ROW; however, there is a wetland located just outside of the ROW to the northeast.

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

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

Potential for Significance: No

Explanation: BPA initiated consultation with a determination of no historic properties affected on July 3, 2024 (BPA CR Project No.: OR 2023 075). Consulting parties included the Confederated Tribes of Grande Ronde, the Confederated Tribes of Siletz Indians, and the State Historic Preservation Office (SHPO) (SHPO Case No. 23-1411). No comments were received.

HEG conducted background research utilizing Oregon SHPO's online database followed by an intensive field survey of the Area of Potential Effects (APE). Background research conducted by HEG indicated that at least 11 previous archaeological surveys have been conducted within one mile of the project APE, none of which included the APE. Additionally, four archaeological resources have been previously identified within one mile of the APE; however, none of these were located within the APE itself. As a result of the archaeological field survey, which included the excavation of four shovel test probes within the BPA fee-owned land, no new cultural resources were located in the APE.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: Grading and excavation activities would permanently impact approximately 0.18 acres from roadway construction and 0.16 acres from stormwater facility construction. The utility trench would result in 400 square feet of temporary impacts. Temporarily disturbed soils would stabilize as vegetation is reestablished following completion of construction. The City of Sherwood would be responsible for implementing county, state, and Federal regulations for required stormwater installations as well as standard construction best management practices to minimize erosion and sedimentation. If hazardous materials are identified in excavated soils, they would be disposed of off-site according to all local, state, and Federal regulations. The proposed action would not impact the current geology.

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

Potential for Significance: No

Explanation: There are no documented occurrences of any special-status plant species present within or near the project area, and no suitable special-status species habitat is present. Impacts to existing vegetation would include the removal, covering, or crushing of mostly non-native grasses and forbs in the project area as well as several trees located on the western portion of the ROW. Temporary disturbed areas and the stormwater facility would be stabilized and reseeded with regionally-appropriate native seed mixes, and standard construction best management practices would minimize vegetation impacts, including the spread of noxious weeds.

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

Potential for Significance: No with Conditions

Explanation: Minor and temporary wildlife disturbance could occur from construction noise. Approximately 0.18 acre of low quality habitat would be converted from mostly non-native grasses to a paved roadway. However, wildlife species that could be present in the area would likely be habituated to this level of disturbance given the project area is surrounded by industrial land uses. There are no documented occurrences of any special-status wildlife species near the project area, and no suitable special-status species habitat is present.

Notes:

- Complete a nest survey immediately prior to tree removal if removing trees during the nesting season. If occupied nests are identified, BPA would require that work be halted in the vicinity of the nest until it can be inspected and assessed by BPA.
- Complete tree removal outside of the breeding/nesting season (i.e., between September 1 and December 31), if possible.

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

Potential for Significance: No

Explanation: No water bodies, floodplains, or fish-bearing streams are present within or near the project area. Standard construction best management practices would prevent indirect impacts to off-site water bodies, floodplains, and fish. Therefore, the proposed action would not impact water bodies and floodplains and would have no effect on fish species or habitats.

### **6. Wetlands**

Potential for Significance: No

Explanation: Pacific Habitat Services, Inc. conducted a wetland delineation in April 2023 for the Ice Age Drive Extension project (Oregon Department of State Lands WD#2023-0374). No wetlands were identified within the ROW; however, an isolated wetland was delineated northeast of the ROW. Standard construction best management practices would prevent indirect impacts to this off-site wetland. Therefore, the proposed action would not impact wetlands.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed action would not generate or use hazardous materials that would contaminate groundwater or aquifers. No new wells or other uses of groundwater or aquifers are proposed. 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 would convert an undeveloped ROW area to a paved two lane road with sidewalks, joint utility trench, and stormwater facility. There would be no impact to adjacent land uses and the project area is not located in a specially-designated area. The City of Sherwood would record the land use agreement with BPA but would remain BPA fee-owned land.

## 9. Visual Quality

Potential for Significance: No

Explanation: During implementation, the presence of equipment and general construction activities would cause temporary visual impacts. The new road, sidewalks, stormwater facility, and tree removal would permanently change the appearance of the property. However, no above-ground structures are proposed and temporary ground disturbance from the utility trench would be returned to original conditions. The changes from the new road would be consistent with the surrounding residential neighborhood, public access streets, and visual quality of the area.

During project implementation, excavation and grading activities would cause temporary visual impacts from construction equipment. The new paved roadway and pedestrian sidewalks would permanently change the appearance of the property. These changes would be temporary and/or consistent with the visual quality of the area given the surrounding industrial and residential development.

## 10. Air Quality

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and vehicle emissions in the local area. Construction of the road would lead to an increase of vehicles through the ROW and could contribute to a change the long-term air quality.

## 11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment and general construction activities would create noise above current ambient conditions. Construction-related noise could be audible to a few private residences and businesses near the project site. Construction noise impacts would be temporary and intermittent and would only occur during daylight hours (approximately 7 AM to 7 PM). There would be a long-term change in ambient noise following completion of the proposed action from traffic noise.

## 12. Human Health and Safety

Potential for Significance: No with conditions

Explanation: Standard construction best management practices would minimize risk to human health and safety. Therefore, the proposed action would not be expected to impact human health and safety.

Notes:

- The Applicant shall notify BPA in a timely manner for any reportable releases of hazardous substances or breaches of environmental requirements and shall mitigate and abate adverse environmental impacts.
- The applicant shall not use or store any hazardous materials on BPA property (i.e., fuels, herbicides, solvents, paints, etc.).

### **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: The proposed action would occur on BPA fee-owned property. The City of Sherwood would be responsible for landowner notification, involvement, or coordination if required.

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

Signed:

Jeremy Doschka  
Environmental Protection Specialist