memorandum

DATE: December 27, 2012

REPLY TO ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Tim Wicks
    Project Manager – TERR-Covington

**Proposed Action:** Williams Northwest Pipeline Land Use Review Request

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

**Location:** King County, Washington

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposed Action:** BPA is proposing to grant a Land Use Review Request (LURR) submitted by Williams Northwest Pipeline (WNP) to replace a portion of their 10-inch diameter South Seattle 2454 loop natural gas pipeline within their existing easement on BPA fee-owned right-of-way (ROW) within BPA’s Maple Valley-Echo Lake transmission line corridor in King County, Washington. Puget Sound Energy (PSE), the primary user of the pipeline, has requested an additional 65 thousand decatherms of delivery capability from WNP to meet rising energy demand in the Seattle, WA region. WNP would increase delivery capacity to PSE by replacing WNP’s existing 10-inch diameter natural gas pipeline with a new 16-inch diameter pipeline.

In order to complete the project, BPA would grant WNP access to an approximate 0.8 acre area between structures 27/3 and 27/4 of BPA’s Sammamish-Maple Valley No.1 230-kilovolt (kV) transmission line, within the Maple-Valley-Echo Lake corridor. Within this area, WNP would clear vegetation and trees to provide access for construction vehicles and space for equipment testing and storage. WNP would excavate a 6 foot deep trench to access and remove the existing 10-inch pipe. The new 16-inch diameter pipe would be assembled, tested, and installed by WNP in the same location in the trench. The trench would subsequently be backfilled, graded, and revegetated with native vegetation. WNP would own, operate, and maintain the new pipeline.

The proposed project would temporarily disturb an area of approximately 0.8 acre for pipeline replacement and associated construction activities. Disturbance would result from the movement of construction vehicles and heavy equipment, organics/soil/debris removal, and the addition and compaction of fill materials. The project site would be accessed from SE 194th Avenue at the west side of the site.
**Resource Review:** BPA reviewed potential impacts to vegetation, wetlands and floodplains, water, federally listed species and critical habitat, and cultural resources by the proposed project.

**Existing Environment.** The project site is located in King County, WA, on a portion of existing BPA fee-owned ROW within BPA’s Maple Valley-Echo Lake transmission line corridor, which lies east of the intersection of SE 194th Avenue and SE 164th Street. The project site is crossed by BPA’s Sammamish-Maple Valley No.1 230-kV transmission line, and WNP’s natural gas pipeline easement. Vegetated areas of the project site are previously disturbed with evidence of fill and grading. The area surrounding the project site consists of a developed suburban neighborhood to the west and the Cedar River to the east.

**Vegetation.** The project would remove existing vegetation comprised of invasive and non-native shrubs and grasses, and mature deciduous and coniferous trees. Disturbed areas would be replanted with a combination of native woody and herbaceous species. No sensitive or federally-listed plant species would be affected.

**Water, Wetlands, and Floodplains.** The Coot Company identified and delineated an approximate 0.10 acre wetland complex consisting of palustrine forested and palustrine emergent wetlands which would be directly impacted by construction activities. The Cedar River and an associated 100-year flood plain are located approximately 650 feet east of the project site. There are no perennial or intermittent streams located within the project site. WNP has applied to the US Army Corps of Engineers for a Section 404 permit, and would utilize best management practices (BMPs) and measures from the Federal Energy Regulatory Commission’s Wetlands and Waterbodies Procedures to minimize disturbance to wetlands, and prevent erosion and runoff from construction activities from entering wetlands or other water resources.

**Federally Listed Wildlife Species and Critical Habitat.** The proposed project would have no effect on these species or their critical habitat located in King County because suitable habitat does not exist within the project area.

**Cultural Resources.** On October 23, 2012, BPA initiated Section 106 consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP) and the Muckleshoot Indian Tribe, the Puyallup Tribe of Indians, and the Snoqualmie Indian Tribe. Based on background research and a cultural survey conducted by Historical Research Associates, Inc. (HRA), BPA determined the proposed project would have no effect on cultural resources or historic properties. The Washington State DAHP concurred with BPA’s determination in a letter dated October 29, 2012.

**Findings:** BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, has not been segmented to meet the definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or
10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

Based on the provisions identified on the attachment, this proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Zachary R. Gustafson
Zachary R. Gustafson
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce          Date: December 27, 2012
Katherine S. Pierce
NEPA Compliance Officer

Attachments:
Environmental Checklist for Categorical Exclusions
Provisions
Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Williams Northwest Pipeline Land Use Review Request

Work Order #: 184006 Task 01

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Potential for Significance</th>
<th>No Potential, with Conditions (describe)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic Properties and Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>2. T &amp; E Species, or their habitat(s)</td>
<td>X</td>
<td></td>
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<tr>
<td>3. Floodplains or wetlands</td>
<td></td>
<td>X</td>
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<tr>
<td>Implement erosion and sediment control best management practices (BMPs) that are protective of wetlands and water resources.</td>
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<td>4. Areas of special designation</td>
<td>X</td>
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<td>5. Health &amp; safety</td>
<td>X</td>
<td></td>
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<td>6. Prime or unique farmlands</td>
<td>X</td>
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<td>7. Special sources of water</td>
<td>X</td>
<td></td>
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<tr>
<td>8. Other (describe)</td>
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</tbody>
</table>

List supporting documentation attached (if needed):

Signed: /s/ Zachary Gustafson Date: December 27, 2012
**Provisions**

This categorical exclusion will meet the following provisions:

**Natural Resources**

- Implement erosion and sediment control best management practices (BMPs) immediately after clearing and prior to ground disturbing activities to prevent erosion and runoff.

- Cut vegetation just above ground level to leave existing root systems in place and allow reestablishment from sprouting, and remove the cut vegetation from wetlands for disposal.

- Restrict tree stump removal and grading activities to directly over the trenchline in wetlands. Do not grade or remove stumps and root systems from the rest of the project area unless deemed necessary by the Chief Inspector or Environmental Inspector.

- Segregate the top 1 foot of topsoil from the area disturbed by trenching, and restore the topsoil to its original location immediately after backfilling is complete.

- Use low-ground-weight construction equipment or prefabricated equipment mats to prevent rutting or mixing of topsoil and subsoil in wetlands.

- Reseed disturbed areas with regionally appropriate native tree and shrub species.

**Cultural Resources**

In the event any archaeological or historical material is encountered during project activities, the following actions should be taken:

- Stop work in the vicinity and immediately notify the BPA environmental lead, a BPA archaeologist, appropriate BPA project staff, interested Tribes, Washington State DAHP, and the appropriate county, state, and federal agencies.

- Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.

- Take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.