

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Keeler-Forest Grove No. 2 Impairment Remedies Project

PP&A No.: 3,818

Project Manager: Sarah Hall – TEPL-TPP-1

Location: Washington County, OR

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

Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to remedy six impairments to the Keeler-Forest Grove No. 2 transmission line in six separate locations in line miles one through ten of the transmission line. The 115-kV wood pole transmission line runs west from Keeler Substation to Forest Grove Substation in Washington County, Oregon. Impairments to the line are located in spans where the distance from the ground to the energized electrical conductor does not meet safety and reliability standards.

BPA is proposing to remedy these impairments by installing taller wood poles in five locations at structures 2/6, 3/2, 4/2, 5/2, and 10/6, and installing different insulators and adjusting the guy anchor angle on wood pole structure 1/6. The transmission line would be taken out of service and the conductor temporarily disconnected from the existing wood poles, which would be excavated and removed. New wood poles would be installed in the same locations. Work crews would utilize developed routes of travel and access roads. Some minor grading and addition of surface rock near work sites may be required. Equipment would likely include line trucks, light duty trucks, an excavator, a backhoe, and a dump truck.

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

Concur:

/s/ Katey Grange
Katey Grange
NEPA Compliance Office

Date: September 6, 2019

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: Keeler – Forest Grove No. 2 Impairment Remedies

Project Site Description

The Keeler-Forest Grove No. 2 Impairment Remedies Project is located in the Prairie Terraces ecoregion of the Willamette Valley in northwest Oregon. The ecoregion is characterized by relatively flat, poorly drained glacio-lacustrine deposits of silts and clays, with meandering streams and rivers. Historically, oak trees and prairies dominated the landscape, with black cottonwood and Oregon ash in riparian areas and near wetlands. Today, the area is farmed, primarily for grass seed and grain, and urban and suburban development is a prominent feature.

The six impairments of Keeler-Forest Grove No. 2 are located in line miles 1, 2, 4, 5, and 10 of the line as it trends westward from Keeler Substation to Forest Grove Substation. The area is predominantly suburban and agricultural, with flat to gently rolling topography, in the general area where the current city of Hillsboro urban growth boundary meets the agricultural fields of the Willamette Valley. The impairment in span 1/6 is located in a farmed field near a subdivision. The impairment in span 2/5 is located in a parking lot of a light industrial center. Span 3/2 and 4/2 impairments are in rural residential and agricultural areas, and 5/2 and 10/6 impairments are located in agricultural areas near county roads and rural residential houses.

Vegetation includes farmed grasses for feedstock and seed, native grasses along lawns and roadsides, as well as common plants and weeds such as Himalayan blackberry, curly dock, teasel, and wild carrot. Wetlands are located throughout the transmission line corridor, and about 20 feet from work areas near 1/6 and 250 feet from work areas near structure 4/2.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

BPA engaged in consultation with the Confederated Tribes of the Grand Ronde and the Oregon State Historic Preservation Office.

On June 14th, 2019, BPA sent a determination letter stating that the undertaking would have no adverse effect to historic properties. No consulted parties responded during the 30-day comment period.

BPA would implement an inadvertent discovery plan in the event that historic and cultural resources are discovered during the course of construction activity.

2. **Geology and Soils**



Explanation:

The project would occur in locations previously disturbed during the original transmission line construction. Work crews would access work sites and complete work using established roads, landings, and direction of travel surfaces, which would result in minimal ground disturbance.

Note:

- 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)



Explanation:

The project would disturb vegetation in the work areas due to excavation of the existing poles and pole holes for replacement with the taller poles, as well as disturbance due to construction traffic and temporary landings. All disturbed soils would be reseeded with a native seed mix post construction.

BPA obtained an official species list for the project area from U.S. Fish and Wildlife on August 29th, 2019. No special status or Endangered Species Act (ESA) listed plant species were identified in the project area during 2013 plant surveys, nor in subsequent site visits in 2018. BPA has determined that the project would have “No Effect” to ESA-listed plant species or designated critical habitat.

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



Explanation:

Project activities would likely temporarily disturb wildlife; primarily birds, small mammals, and perhaps deer due to the project’s location and the local ecology. However, the disturbance would be temporary. No tree removal would be required to complete the project.

BPA obtained an official species list for the project area from U.S. Fish and Wildlife on August 29th, 2019. There are no records of ESA-listed species documented in State of Oregon databases in the project area, and no designated critical habitat is present in the project area. BPA has determined that the project would have “No Effect” on ESA-listed wildlife or designated critical habitat.

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



Explanation:

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

No in-water work is planned in or near ESA-listed fish streams or other water bodies. BPA has determined that the project would have “No Effect” on ESA-listed fish and designated critical habitat.

6. **Wetlands**



Explanation:

The wetland near structure 4/2 would be avoided during pole replacement activities due to the proximity of paved access roads to structure 4/2. The wetland near 1/6 is a farmed wetland immediately adjacent to the structure site. Work crews would likely need to drive through the wetland to access the structure, though no significant ground disturbance would be necessary within the wetland for pole replacement activities.

Note:

- Work would be completed during dry summer months of July through September if possible.
- If construction activities would result in rutting greater than 3" deflection within the wetland, then wetland mats would be utilized to minimize impacts to wetland.

7. **Groundwater and Aquifers**



Explanation:

The planned excavation for the project to replace the existing wood pole structures would not extend to a depth that would intercept groundwater or aquifers.

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



Explanation:

Land use in the area consists of utility easement, agriculture, industrial/commercial, and rural residential. There are no specially designated areas nearby. Land use would not change or be affected by project activities.

9. **Visual Quality**



Explanation:

Project activities would increase the overall height of five wood pole transmission structures. However, height increases would be incremental (5 to 10 ft.), and would not change the existing visual quality of the transmission line easement.

10. **Air Quality**



Explanation:

Some dust may be generated due to construction activities, including excavation and backfill, as well as construction traffic. However, impacts to air quality would be minimal and temporary. If necessary, water trucks would be used to minimize dust generation.

11. **Noise**



Explanation:

Temporary noise may be generated due to construction traffic, excavation, and general construction activities. However, noise impacts would likely be negligible and blend with normal ambient noise in the project area.

12. **Human Health and Safety**



Explanation:

A site specific job safety plan would be developed and implemented in the field by construction crews. Daily safety meetings would be held to discuss safe work practices on the construction site and when working in public areas.

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, if necessary:

Not applicable

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

Not applicable

- 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, if necessary:

Not applicable

- 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, if necessary:

Not applicable

Landowner Notification, Involvement, or Coordination

Description: Project location land is federally owned by Bonneville Power Administration, private, and utility owned. BPA would coordinate project activities with the underlying landowners at each work location, notifying landowners of the project's schedule, and solicit comments for site restoration and revegetation as necessary.

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
Aaron Siemers, EPR-4
Environmental Protection Specialist

Date: September 6, 2019