

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Vancouver Sewer Line Replacement by Clark Regional Wastewater District

**Project No.:** LURR #20200159

**Project Manager:** Charlene Belt, TERR-ROSS MHQA

**Location:** Clark County, Washington

**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 Clark Regional Wastewater District (CRWWD) to replace a sewer line within a BPA fee-owned transmission line corridor in Vancouver, Clark County, Washington. The existing sewer line was installed in 1977. It needs to be replaced with a larger diameter sewer pipe due to a problem with surcharging (back-up). The total length of the portion of the sewer line that would be replaced on BPA lands is about 1,350 feet long. The sewer line replacement would not affect BPA transmission facilities.

CRWWD has a 20-foot-wide easement from BPA for the existing sewer line, within the transmission line right-of-way. CRWWD requested an additional 30-foot-wide temporary easement, adjacent to their sewer line easement for a total width of 50 feet. The 50-foot-wide construction easement would be needed so that equipment could move and be parked temporarily. Staging and stockpiling of materials and longer term vehicle and equipment parking areas would not be located on BPA lands.

Construction areas would be accessed using existing access. From the southern end of the easement, access would be from Salmon Creek Ave to the south. From the northern end of the construction easement, access would be from the driveway just to the north of transmission line Structure 6/1. An existing gate could need to be replaced and, after construction, the existing access road could need to be graded and gravel added in order to return it to preconstruction condition.

The year prior to the sewer line replacement, likely in August, CRWWD would conduct geotechnical work within their construction easement. This information is needed to determine if there is standing water beneath the surface that would need to be pumped out during sewer line replacement. About six test pits would be dug on BPA fee-owned land with a rubber-tracked excavator or rubber-tired backhoe to a maximum depth of about 10 feet. It is anticipated that the test pits would be between 3 feet wide and 8 to 10 feet long.

The year following the geotechnical excavations, the 10-inch-diameter sewer pipe would be replaced in the same trench as the existing sewer line with a 15-inch-diameter sewer pipe. The new sewer line would be placed about 6 to 10 feet in depth in a trench that would be dug using

excavation equipment, such as back hoes. The trench would be dug about 3.5 feet in width and the replacement sewer pipe would be embedded in the trench on about 6 to 12 inches of new rock. Surface level manholes and permanent markers would be installed about 12 inches above grade as needed, close to the location of the existing manholes and markers.

A public walking trail crosses the transmission line right-of-way in the form of a wooden boardwalk. The boardwalk would be removed during excavation and replaced with another wooden boardwalk after construction.

**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/ Kimberly St.Hilaire

Kimberly St.Hilaire  
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange                      June 7, 2021

Katey C. Grange                      Date  
NEPA Compliance Officer

Attachment(s):  
Environmental Checklist  
BPA Inadvertent Discovery Plan for Cultural Resources

## 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:** Vancouver Sewer Line Replacement by Clark Regional Wastewater District

### **Project Site Description**

The proposed project is in Vancouver, Clark County, Washington in Section 24, Township 3 North, Range 1 East. The portion of the Ross-Lexington No. 1 230-kV transmission line corridor where the sewer line would be replaced is immediately to the north of Salmon Creek Avenue. It includes BPA transmission line right-of-way from Salmon Creek Avenue, north to an unpaved road immediately to the north of BPA transmission line Structure 6/1 to the north. A public walking trail, constructed as a boardwalk, traverses the transmission line corridor.

In the area where the project would occur, BPA's fee-owned right-of-way runs north/south with a public road to the south and a graveled road to the north. The public road, Salmon Creek Avenue, is a busy urban road, serving areas of residential development and the Washington State University—Vancouver campus, which is located to the west of the project area. A large currently undeveloped parcel to the east is proposed to be developed as a new housing addition. There are no nearby houses at this time.

Salmon Creek is located about 450 feet south of the project location on the opposite side of Salmon Creek Avenue. An agricultural field and some rural residences are located between the Salmon Creek riparian area and Salmon Creek Avenue.

The southern third of the project area, immediately to the north of Salmon Creek Avenue, is an agricultural field and upland meadow, dominated by non-native grasses. An emergent wetland is located within in the northern 2/3rds of the project area. The wetland extends off the BPA right-of-way to the east and west. Dominated by herbaceous species, it is vegetated with dense reed canarygrass (*Phalaris arundinacea*), a non-native species, with scattered clumps of native soft rush (*Juncus effusus*) with areas of cattails (*Typha latifolia*). A few scattered small trees, including a small white oak (*Quercus garryana*) grow at the edge of the BPA right-of-way.

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

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

Potential for Significance: No with Conditions

**Explanation:** BPA conducted consultation under Section 106 of the National Historic Preservation Act (NHPA) with the Washington Department of Archaeology and Historic Preservation (DAHP), the Confederated Tribe of the Siletz Indians, the Confederated Tribes of the Grand Ronde Community of Oregon, and the Cowlitz Indian Tribe (consulting parties). On

July 22, 2020, BPA initiated NHPA consultation with consulting parties. They were informed of the project and provided an opportunity to provide information on the Project Area of Potential Effects (APE). The APE included the entire fee-owned BPA right-of-way from Salmon Creek Road to the south, extending to the north to the access road near transmission Structure 6/1. DAHP concurred with the APE by letter on July 27, 2020. BPA conducted a cultural resources field survey and did not find cultural resources within the APE. On October 15, 2020, the field survey report was provided to consulting parties for a 30-day review period. On October 16, 2020 DAHP concurred with BPA's determination of No Historic Properties Affected by letter, stating that an Unanticipated Discovery Plan for cultural resources should be followed during construction. The consulting Tribes did not comment.

The following measure would be implemented to avoid impacts to any undiscovered cultural resources and to ensure that proper procedures are followed if any cultural resources are discovered during project construction.

**Notes:**

- All project staff and construction workers, including CRWWD and their contractors, will implement the attached BPA Inadvertent Discovery Plan

## **2. Geology and Soils**

Potential for Significance: No with Conditions

**Explanation:** Soils would be excavated for the six geotechnical test pits in areas about 3 feet wide and by 10 feet long and 10 feet deep. About 67 cubic yards would be excavated for soil test pits, then replaced. About 0.1 acre of soil would be excavated by heavy equipment for the sewer line trench excavation. About 1,300 cubic yards would be excavated for the sewer line trench, then replaced. Up to 1.6 acres of soils could be compacted by heavy equipment used for construction.

**Notes:** To minimize disturbance to soils, the following best management practices (BMPs) would be implemented:

- Conduct work during the summer (August to September) when soils are most likely to be dry.
- Stage rock outside of the construction easement.
- Clearly demarcate and minimize the size of construction and staging areas within the right-of-way by confining work to the smallest possible area within the construction easement.
- Follow the DOE Construction General Stormwater Permit and any other required permits related to erosion control and pollution prevention.
- Any erosion control materials used in the project area must be certified weed free.
- All permanent erosion and sediment control materials, must be biodegradable.
- Use rubber tracked vehicles to excavate soils.
- Prior to excavation, strip grass and topsoil and set aside placed on tarps or sheeting.
- Stockpile excavated soils on tarps or sheeting.
- Temporarily stored soils must be at least 50 feet from any water of the state.
- Replace excavated soils in the hole or trench, subsoils first and topsoil on top, with vegetation upright, as much as possible.
- Manage all soil stockpiles from wind and rain erosion through the use of erosion and sediment control BMPs.
- After construction, decompact soils as necessary and re-contour any vehicle rutting.
- Any excess soils and gravels not utilized in the ROW shall be removed from the site and disposed of according to Washington Administration Code, Vancouver Municipal Code, and Federal regulations

- For restoration purposes, comply with the Stormwater Management Manual for Western Washington Volume II (July 2019) for topsoil reuse, mulching, and reseeding BMPs, except that native upland and wetland seed must be used rather than non-native species.
- All temporary erosion control materials are must be removed by the Contractor when no longer needed in the area.

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

Potential for Significance: No with Conditions

**Explanation:** Vegetation would be removed for the excavation of the test pits and the trench for the sewer line. Other impacts to vegetation would result from crushing by machinery and soil compaction. The vegetation is mainly low-quality because non-native grasses dominate the areas where excavation would occur. Impacts to vegetation are expected to be temporary because areas where vegetation is removed are expected to recover after reseeding. Three ESA-listed plant species are on the US Fish and Wildlife Service list for Clark County (obtained on May 4, 2021): Golden Indian paintbrush (*Castilleja levisecta*), water howellia (*Howellia aquatilis*), and Bradshaw's lomatium (*Lomatium bradshawii*). Because the project work spaces do not contain suitable habitat for these species, the project would have no effect on ESA-listed plant species.

Best management practices would be followed to minimize impacts to vegetation, as described under #2, Soils and Geology above, and by implementing the following measures.

**Notes:**

- Wash equipment and vehicles at weed wash stations prior to entering the project site.
- Confine soil disturbance to the smallest possible area within the Project work area.
- Where possible cut or crush vegetation, rather than removing vegetation.
- Reseed any areas where vegetation is removed with native plant species that are known to occur in southwest Washington and are approved by BPA.
- Plant wetland species in the wetland area and upland native species in the upland area.
- Lay down pipe or other materials on BPA land for less than 30 days in order to prevent killing vegetation.

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

Potential for Significance: No with Conditions

**Explanation:** Wildlife habitat would be removed for the excavation of the test pits and the trench for the sewer line. Other impacts to wildlife habitat would result from crushing by machinery and soil compaction. The wildlife habitat is mainly low-quality because non-native grasses dominate the areas where excavation would occur. Impacts to wildlife habitat are expected to be temporary because areas where vegetation is removed are expected to recover after reseeding.

Any wildlife present in the area during construction would be temporarily disturbed and displaced by construction noise and the presence of people and equipment. It is expected that most wildlife would be mobile enough to move out of the area during construction and return after construction is completed. Since construction would take place in August to September, it is not expected to harm any breeding animals, including nesting birds.

Four ESA-listed threatened wildlife species are on the US Fish and Wildlife Service list for Clark County (obtained on May 4, 2021) Oregon spotted frog (*Rana pretiosa*), northern

spotted owl (*Strix occidentalis caurina*), streaked horned lark (*Erenophila strigata*), yellow-billed cuckoo (*Coccyzus americanus*), and gray wolf (*Canis lupus*). There would be no effect to these species from the project due to a lack of suitable habitat within the project area. There is no ESA-designated critical habitat in the Project area.

Best management practices would be followed to minimize impacts to wildlife habitat, as described under #2, Soils and Geology and #3 Plants above and by implementing the following measures.

**Notes:**

- Conduct work during the daylight hours and do not use any night time illumination.
- Conduct work during the dry summer months (August to September) when wildlife are not generally nesting or breeding.

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

Potential for Significance: No

**Explanation:** Salmon Creek provides habitat for fish species, including chinook salmon, coho salmon, steelhead, rainbow trout, and coastal cutthroat trout. Three fish species listed as federally threatened under the ESA occur in Salmon Creek: coho salmon, chinook salmon, and steelhead. Salmon Creek is also designated critical habitat under the ESA for coho salmon. Water quality and fish habitat along and in Salmon Creek would not be affected by the Project because Salmon Creek Avenue, an agricultural field, and riparian vegetation are located between construction areas and the creek. The intervening vegetation would prevent the flow of sediments into Salmon Creek. There would be no effect on ESA-listed or sensitive fish species.

Best management practices, as described under #2, Soils and Geology above, and permit conditions would ensure that sedimentation does not enter Salmon Creek and its associated floodplain. Because the project area is not within the Salmon Creek floodplain, floodplains would not be affected by the Project.

**6. Wetlands**

Potential for Significance: No with Conditions

**Explanation:** A large emergent wetland is present in the northern 2/3rds of the Project area. This wetland is categorized as a Category III wetland under Clark County Code which defines this type of wetland as having some type of disturbance and a moderate level of functions (CCC 40.450.020B 1c). Wetlands would be temporarily impacted by geotechnical excavations and replacement of the sewer pipe.

Geotechnical excavations would temporarily impact about 180 square feet of wetland (6 test pits 3 feet by 10 feet). The existing sewer pipe is located within the wetland so replacement in the same trench would impact wetlands. Impacts would be temporary because the soil and vegetation removed during excavation would be replaced. A total of 43,820 square feet of wetland would be impacted by construction activities, including the excavation of soils for the placement of the sewer line. Clark County Code specifies a 75-foot-wide buffer for the Category III wetland. For this project, temporary impacts to the wetland buffer would include 13,125 square feet within the 50-foot construction easement, located to the south of the wetland. Excavated soils would be placed back in excavated

areas after completion and disturbed areas would be restored in accordance with permit conditions to reduce the overall long-term wetland impacts.

Notes:

- CRWWD must comply with the Clark County Wetland Protection Ordinance (CCC Chapter 40.450).
- CRWWD must obtain a Nationwide Permit (NWP-6 Survey Activities) prior to conducting geotechnical excavations, if required by the Army Corps of Engineers, and provide preconstruction notification to the Corps and comply with all permit conditions.
- Any soils temporarily stockpiled from excavations in the wetland must be replaced within 30 days.
- If excavated areas in wetlands need dewatering, the water must pass through a filter before being spread on uplands in the project area.
- After replacement of temporarily excavated soils in wetlands, the wetland must be returned to pre-construction elevations and revegetated with native wetland species that are known to naturally occur in the project area.
- CRWWD must obtain a Nationwide Permit (NWP-3 Maintenance Authorization) prior to conducting sewer line replacement work, and provide preconstruction notification to the Corps and comply with all permit conditions.

## 7. Groundwater and Aquifers

Potential for Significance: No

**Explanation:** About 1.6 acre of land would be temporarily disturbed by the project during the dry time of year, but soil and vegetation would be replaced. This amount of disturbance would not be expected to affect ground water recharge or aquifers.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No with Conditions

**Explanation:** The existing land uses in the project area would not be affected by this project. The use of the trail that crosses the transmission line right-of-way would be temporarily halted while construction is in progress. Construction is expected to take a few months, then the boardwalk would be replaced. After the sewer line is replaced, the BPA transmission line corridor will continue to function as open space with a trail crossing. Impacts to land use would be minimized by implementing the following measure.

**Notes:**

- Replace the boardwalk trail crossing the transmission line corridor during construction.

## 9. Visual Quality

Potential for Significance: No with Conditions

**Explanation:** Viewers of the project area mainly include motorists traveling on Salmon Creek Avenue, who have brief views of the project area. Views of construction equipment, materials, and excavated areas will temporarily degrade the views of the natural appearing open space in the project area. Once construction is complete, the area will be revegetated and evidence of excavation could be evident for a year or more, but eventually the area will return to its former appearance.

**Notes:**

- Do not deposit equipment and materials, such as sewer pipe, on BPA lands for more than 30-days prior to use.

## 10. Air Quality

Potential for Significance: No

**Explanation:** During construction, equipment and vehicle use would result in a temporary increase in air pollutants. The amount of pollutants emitted would not result in an exceedance of air quality standards. Impacts to air quality would be minimized by implementing the following measure.

**Notes:**

- Do not leave equipment or vehicles idling, when not in use.

## 11. Noise

Potential for Significance: No with Conditions

**Explanation:** During construction, equipment and vehicle use would result in a temporary increase in noise during daylight hours. Noise would be intermittent and occur over a period of several months, then cease once construction is completed. There are few nearby sensitive noise receptors, such as homes. Motorists are expected to only be affected by any increased noise for a very brief period. Impacts from noise would be minimized by implementing the following measure.

**Notes:**

- Do not leave equipment or vehicles idling, when not in use.
- All construction must occur during daylight hours.

## 12. Human Health and Safety

Potential for Significance: No with Condition

**Explanation:** Construction is not expected to impact human health and safety. Impacts to human health and safety would be minimized by implementing the following measures.

**Notes:**

- During construction, CRWWD must post signage along the trail stating that the trail is closed and there is no entry permitted and ensure that no public use of the trail takes place.
- CRWWD must work with BPA to follow BPA's safety protocols and requirements for working safely around energized transmission facilities and ensure all relevant safety language is in construction specs.

### **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:** BPA did not conduct any landowner notification for this Project due to the rural nature of the Project area. CRWWD conducted notification to Washington State University.

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

Signed: /s/ Kimberly St.Hilaire June 7, 2021

Kimberly St.Hilaire, ECT-4  
Environmental Protection Specialist

Date