

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Grayrock 179<sup>th</sup> & 187<sup>th</sup> Street Access Roads

**Project No.:** LURR 2022-0326

**Project Manager:** Billie Woodman

**Location:** Clark County, WA

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline right-of-way; B1.13 Pathways, short access roads, and rail lines; B4.7 Fiber optic cable; B1.24 Property Transfers

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Grayrock Resources LLC (Grayrock) to remove two existing paved residential driveways and construct two new public streets within BPA's North Bonneville-Ross No. 1 and No. 2 transmission line fee-owned rights-of-way. The proposed street crossings would run north and south perpendicular to BPA's right-of-way between structures 27/5 – 28/1 and 28/2 – 28/3. The two proposed street sections would be 70 feet wide to allow for construction of the proposed streets and sidewalks. The proposed crossings would be a minimum of 50 feet away from all transmission towers.

The removal of two existing paved residential driveways within BPA's right-of-way would take place outside of the proposed construction area of the permanent public streets and would affect approximately 0.1 acre (7,500 square feet) during removal. Excavated asphalt would be disposed of off BPA property in accordance with all applicable local, state, and federal regulations. Both driveways are located east of BPA's North Bonneville-Ross transmission line 28/2 towers. Removal of the two driveways would require Clark County Public Utility District (PUD) to remove their overhead and underground utility line within BPA's right-of-way.

The new public street construction would require clearing vegetation, trenching for possible utility installation, grading and compacting soils for the roadbed, and laying two permanent asphalt paved public streets and compacted concrete sidewalks. Specifically, the proposed streets would require excavation for underground utilities including, but not limited to, water, sewer, natural gas, telecommunications, and electrical within the proposed right-of-way. These two separate trenches along BPA's right-of-way would be approximately between 24 – 48 inches deep, 24 – 36 inches wide, 300 feet long, and would connect existing sources from the existing public street (NE 18<sup>th</sup> St.) to the new proposed streets.

The two street crossings would impact approximately 1.8 acres of BPA right-of-way. About 1 acre of that area would be permanently contained within the road and sidewalks. The remaining 0.8 acre of disturbance would be temporary and restored after project completion. The additional temporary ground disturbance from vehicles, equipment use, and excavation for the proposed utilities would extend approximately 30 feet on either side of the proposed new streets.

Excavated concrete, asphalt, and soil would be used for backfill or disposed of off BPA property in accordance with all applicable local, state, and federal regulations. Temporarily disturbed areas during construction would be re-contoured and reseeded with an appropriate native seed mix.

Once construction is completed BPA would dispose of the in-fee right-of-way and reserve an access easement within the right-of-way to avoid any future liability of the proposed public roads and sidewalks.

**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/ Sylas Daughtrey  
Sylas Daughtrey  
Environmental Protection Specialist

Concur:

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Katey C. Grange  
NEPA Compliance Officer

# 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:** Grayrock 179<sup>th</sup> & 187<sup>th</sup> Street Access Roads

## **Project Site Description**

The project site is located on BPA fee-owned property in Clark County, Washington on the North Bonneville-Ross No. 1 and No. 2 transmission lines (Township 2 North, Range 3 East, Section 30). The general construction area consists of two paved residential driveways, as well as areas consisting of non-vegetated and vegetated with common native and non-native grasses, shrubs, and trees. No wetlands or surface water are present within or near the project site. Areas surrounding the project site primarily consist of low-density single family residential properties, the Harmony sports complex, some agricultural fields, and a soil and gravel pit.

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

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

Potential for Significance: No

Explanation: BPA conducted background research of the Area of Potential Effects (APE). The majority of the APE has been previously surveyed, and no archaeological sites have been recorded. Further, no archaeological sites were identified as a result of BPA's archaeological field survey and shovel test probing. The entire APE is also documented to have substantial disturbance previously associated with transmission line construction, residential pavement construction, farming, and PUD utility installations. BPA's north Bonneville-Ross No. 1 and No. 2 transmission line is located within the APE and is considered eligible for inclusion in the National Register of Historic Places (NRHP). However, the proposed project would not alter the integrity or eligibility of the transmission line.

On August 4, 2023, BPA simultaneously determined that the proposed undertaking would result in no adverse effect to historic properties (BPA CR Project No.: WA 2022 208; DAHP Log No.: 2023-04-02587-BPA) and initiated National Historic Preservation Act, Section 106 consultation with the Cowlitz Indian Tribe and Washington Department of Archaeology & Historic Preservation (DAHP). On August 7, 2023, DHAP concurred with BPA's determination. As of September 8, 2023, no other comments were received following the 30 day review period.

Notes:

- Implement inadvertent discovery protocols in the unlikely event that cultural material is encountered during the implementation of this project. BPA would require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

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

Potential for Significance: No

Explanation: The new public access road would permanently impact approximately 1 acre. An additional 0.9 acres of temporary soil disturbance from compaction and rutting would occur from vegetation removal, utility installation, construction vehicle access and grading along both sides of the proposed public roads and in the driveway removal area. Temporarily disturbed soils would stabilize as vegetation is reestablished following completion of construction. Grayrock LLC construction would be responsible for implementing county, state, and federal regulations for required storm water installations as well as standard construction best management practices to minimize erosion and sedimentation. The proposed action would not impact the current geology.

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

Potential for Significance: No

Explanation: The proposed construction would cover vegetated and non-vegetated areas in compacted asphalt and hardened concrete. The additional temporary vegetation disturbance, such as crushing of vegetation and vegetation removal would occur from road installation and driveway removal. Temporary disturbed areas would be stabilized and reseeded with a regionally-appropriate native seed mix, and standard construction best management practices would minimize vegetation impacts, including the spread of noxious weeds. There are no listed or special-status plant species present within the project area.

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

Potential for Significance: No

Explanation: The proposed action would require clearing common native and non-native grasses, shrubs, and trees that are not considered suitable habitat for special-status wildlife species. The minor and temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during construction. However, any wildlife species that could be present in the area would likely be habituated to this level of disturbance given surrounding land uses. There are no listed or special-status wildlife species present within the project area.

### **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 site. Therefore, the proposed action would not impact water bodies and flood plains and would have no effect on fish species or habitats.

### **6. Wetlands**

Potential for Significance: No

Explanation: There are no wetlands at the proposed construction site.

### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Ground disturbance would occur at the proposed construction site; however, the construction area would take place in and around previous ground disturbance. These areas include paved, and/or compacted soils. Standard construction best management

practices would prevent contamination in the event of a spill. Therefore, the proposed action would have no disturbance to groundwater or aquifers.

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

Potential for Significance: No

Explanation: The two new proposed public roads with additional sidewalks would constitute a permanent land use change. However, this permanent change would occur entirely on BPA fee-owned property and would not impact adjacent land use. BPA would draft a temporary land-use agreement during the construction period to allow access within BPA's fee-owned right-of-way. Once construction is completed BPA would dispose of the in-fee right-of-way and reserve an access easement within the ROW due to avoid liability of the proposed public roads and sidewalks.

## **9. Visual Quality**

Potential for Significance: No

Explanation: During implementation, the presence of equipment and general construction activities, including vegetation removal and grading, would cause temporary visual impacts. The new residential paved access road and pedestrian sidewalks would permanently change the appearance of the property. However, no above-ground structures are proposed, and temporarily disturbed areas would approximately return to original conditions. These changes would be temporary and/or consistent with the surrounding residential neighborhood, public access streets, and visual quality of the area.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed action would produce minor and temporary dust and vehicle emissions in the local area. No long-term change in air quality would occur following the completion of the proposed action.

## **11. Noise**

Potential for Significance: No

Explanation: The proposed action could produce intermittent noise at levels greater than current ambient conditions, which could be audible outdoors on nearby residential properties. Noise impacts would be temporary and would only occur during daylight hours (approximately 7 AM to 7 PM). No long-term change in ambient noise would occur following completion of the proposed action.

## **12. Human Health and Safety**

Potential for Significance: No

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.

## **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 project site is located on BPA fee-owned property, and BPA would notify any other easement holders on the BPA property, if required. Clark County PUD and Grayrock Resources LLC would be responsible for any adjacent 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: /s/ Sylas Daughtrey  
Sylas Daughtrey  
Environmental Protection Specialist

September 26, 2023  
Date