

memorandum

DATE: May 15, 2012

REPLY TO
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Dawneen Dostert
Project Manager – TERR-LMT

Proposed Action: City of Longview Pump Stations and Force Main Project

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

Location: Longview, Cowlitz County, Washington
T7N, R2W, Section 5: T8N, R2W, Section 32: and T8N, R2W, Section 31

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA proposes to grant a multiple use request submitted by the City of Longview, Washington, to permanently install an underground sewer line and temporarily locate staging areas within a BPA transmission line right-of-way. The proposed sewer line would be a 20-inch-diameter pipe (forcemain) made of high-density polyethylene (HDPE). It would be buried at a depth of 4–5 feet within BPA’s Longview-Cowlitz No. 1, 115 kilovolt (kV) transmission line right-of-way for approximately 3,000 feet. A non-metallic trace wire would run along the pipe underground.

The sewer line would enter BPA’s right-of-way about 80 feet northwest of 26th Avenue, and leave the right-of-way where Douglas Street turns north off of Alder Street. At each power pole, the pipe would be deflected to maintain 9 feet between the pole and the pipe—at these locations, the pipe would be outside of BPA right-of-way. The sewer line would then parallel BPA right-of-way for approximately another 600 feet.

A temporary construction easement is also being requested in BPA right-of-way within this area, with two specific 20-foot by 100-foot laydown/storage areas identified within the overall temporary construction easement. Construction would involve digging a 4–5-foot-deep by 4-foot-wide trench for the pipe, most of which would then be covered with soil and paved with hot-mix asphalt for the proposed Highlands Trail. Disturbed areas outside of the proposed Highlands Trail would be allowed to naturally revegetate (the affected area currently consists primarily of weedy non-native grasses). The total affected area within BPA right-of-way would be about 3 acres, with only about 0.2 acre permanently affected by the buried sewer line.

Resource Review: Potentially affected environmental resources were reviewed to determine whether they could be impacted by the project, including federally listed species, wetlands, water resources, and cultural resources.

Federally Listed Species. A contractor for the City of Longview completed a biological assessment on species listed as threatened or endangered under the Endangered Species Act. In their biological assessment, they determined there would be **no effect** to federally listed species,

as documented in a letter submitted to the City of Longview on March 27, 2012. (BPA had also made a determination of **no effect** for all ESA-listed species, designated critical habitat, and essential fish habitat in the same project area for the related Highlands Trail project [HighlandsTrail_NE_Memo 2011]).

Wetlands. A wetland delineation was completed in March 2012 by a contractor for the City of Longview since the National Wetland Inventory (NWI) indicated the presence of palustrine, emergent, temporarily flooded (PEMA) wetlands at the intersection of Ditch #3 and Ditch #1, where a temporary construction easement is being requested on BPA right-of-way. However, the field delineation did not find evidence of wetlands based on the absence of appropriate hydrologic and soil conditions. Therefore, the project would have **no impacts** on wetlands.

Water Resources. The proposed forcemain within BPA's right-of-way would run adjacent to Ditch 3 along SR-432, which has been designated as a 303d-listed stream by the Washington Department of Ecology (Ecology) under the Clean Water Act. Construction activities have the potential to generate minor erosion that could enter Ditch #3 (as well as nearby Ditch #1), which are located 15–25 feet away from the proposed forcemain location. The City of Longview has stated that a Construction Stormwater Pollution Prevention Plan (SWPPP) will be written and will specify Best Management Practices (BMPs) to avoid or minimize direct impacts to waterbodies during construction. The City of Longview is responsible for consulting with Ecology concerning any requirements pertaining to the Clean Water Act, including potential stormwater runoff during construction and the 303d listing of Ditch 3, which may include restrictions on herbicide use and management of potential spills of hazardous materials such as vehicle fuel leaks during construction or sewage leaks during operation of the new line.

Cultural Resources. On February 17, 2012, BPA initiated Section 106 consultation with the State of Washington Department of Archaeology and Historic Preservation (DAHP), The Confederated Tribes of the Chehalis, and the Cowlitz Indian Tribe. To identify the presence of any cultural resources or historic properties in the affected area, a contractor for the City of Longview completed background research on December 20, 2011, followed by archaeological surveys on January 26th and 27th, 2012. No archaeological materials or historic properties were identified, and the City of Longview determined there would be no adverse effects to historic properties, and that no further cultural resource investigations were recommended for the project. BPA concurred with this determination, as did the State of Washington DAHP in a letter to BPA on March 20, 2012. No correspondence regarding the project was received by the Tribes consulted by BPA.

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.

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/ Kara Hempy-Mayer
Kara Hempy-Mayer
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce
Katherine S. Pierce
NEPA Compliance Officer

DATE: May 16, 2012

Attachment:
Environmental Checklist for Categorical Exclusions

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: City of Longview Sewer Line Land Use Request

Work Order #: 184006

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.

<u>Environmental Resources</u>	<u>No Potential for Significance</u>	<u>No Potential, with Conditions (describe)</u>
1. Historic Properties and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Floodplains or wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Areas of special designation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Health & safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Prime or unique farmlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other (describe)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed: /s/ Kara Hempy-Mayer

Date: May 15, 2012