

# memorandum

DATE: March 20, 2013

REPLY TO  
ATTN OF: KEPR-4

SUBJECT: Environmental Clearance Memorandum

TO: Richard Heredia  
Project Manager – TEP- TPP- 1

**Proposed Action:** Sundial Island Transmission Tower Relocation

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.6 Additions and modifications to transmission facilities

**Location:** Multnomah County, OR

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

**Description of the Proposed Action:** BPA is proposing to relocate two transmission towers located on Sundial Island in the Sandy River Delta Recreation Area (SRD). The transmission towers, Big Eddy-Troutdale No. 1 230-kilovolt (kV) tower 77/1 and Ostrander-Troutdale No. 1 500-kV tower 24/1, are being compromised by stream bank erosion.

Sundial Island is located within the Columbia River Gorge National Scenic Area (NSA) and is a partially forested, multi-use, recreation area. The island is located just north of the mainland SRD and is accessed by using a dam that crosses a side channel of the Sandy River (the side channel was, historically, the main stem of the Sandy River). Both towers require relocation based on their proximity to the rapidly eroding west side of Sundial Island. Tower 77/1 and tower 24/1 are currently located approximately 15 feet and 60 feet from the bank, respectively. As a result of this rapid erosion, it is proposed to relocate each tower 50-75 feet back-on-line (BOL) or inland from the stream bank. Additionally, the towers will be rebuilt from traditional four-leg lattice steel towers to single pole steel structures with single footings 80-100 feet in depth. These towers are designed as such in order to allow the towers to remain in place regardless of future erosion and hydrologic changes to the river. The new towers will require lighting based on their proximity to the Troutdale Airport and associated Federal Aviation Administration (FAA) requirements. Thus, BPA will bury conductor underground to power this lighting. The conductor will remain underground, but within BPA's right-of-way (ROW), at all times.

In addition to the tower relocation, BPA proposes to remove a revetment structure located just offshore of the Big Eddy-Troutdale No. 1 77/1 transmission tower. BPA engineers have determined that the in-water structure is exacerbating the erosion occurring at the tower site. Once removed, erosion activities at the site should return to a natural process.

As a final step on this project, BPA will be performing maintenance activities on several transmission towers located along both the Big Eddy-Troutdale No. 1 and Ostrander-Troutdale

No. 1 transmission lines. The maintenance activities include the replacement of insulators and other hardware at towers 76/2, 76/3, and 76/4 on the Big Eddy-Troutdale No. 1 line, and towers 23/2, 23/3, 23/4 and 24/2 on the Ostrander-Troutdale No. 1 line. All maintenance activities will be performed on BPA's ROW.

**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/ Aaron Shurtliff

Aaron Shurtliff  
Environmental Engineer

Concur: /s/ Stacy Mason

Stacy Mason  
NEPA Compliance Officer

DATE: March 20, 2013

Attachments:  
Environmental Checklist for Categorical Exclusions

## Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Sundial Island Transmission Tower Relocation

Work Order #: 308514, 308513

**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 No historic properties affected. SHPO concurrence with cultural survey results received 11/13/12.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s) No species or habitat will be impacted by this project. ESA listed fish species (no plants or wildlife present) occur within the project area, but the revetment removal will take place within the in-water work window (July 15-Aug 31). No shade trees will be removed. Potential sedimentation will be controlled by water quality monitoring and by use of appropriate erosion control BMPs, and as described in the US Army Corps. Of Engineers Standard Local Operating Procedures for Endangered Species biological opinion. Nationwide Permit No. 27 along with the General and Regional conditions will be used to perform in-water work.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Floodplains or wetlands No impact to floodplains.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Areas of special designation An initial letter from the USFS stating consistency with the NSA Management Plan was received on 08/02/12. A second consistency letter from the USFS was received on 11/19/12 regarding the revised scope that included removal of the revetment structure and installation of three underground conductor cables to the subject towers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Health & safety None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Prime or unique farmlands None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other (describe) None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed /s/ Aaron Shurtliff

Date March 1, 2013

Aaron Shurtliff, KEPR-4