

memorandum

DATE: August 26, 2013

REPLY TO
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Charley Majors
Project Manager – TEP-CSB-2

Proposed Action: Naselle Ridge Emergency Generator Replacement

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

Location: Pacific County, Washington

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA is proposing to replace equipment and expand its Naselle Ridge Radio Station yard near the City of Naselle in Pacific County, Oregon. The existing fuel cell has ceased to function and is beyond its serviceable life, leaving BPA's radio station without a backup power system. The installation of a new emergency generator, propane tank, and associated equipment, and expansion of the radio station yard to accommodate the new equipment, would restore reliable backup power system to this critical communications facility.

In order to complete the project, BPA would remove the existing fuel cell, construct a new 18 foot by 13 foot shed, install a new emergency generator within the shed, install a 2,000 gallon propane tank, and expand the east side of the radio station yard by 10 feet to maintain a minimum safe distance of 25 feet between the tank and the nearest critical equipment. BPA would additionally remove approximately 25 feet of underground power line located beneath the footprint of the new emergency generator shed, relocate the existing power meter from an existing radio building to the new shed, and reconnect the remaining underground power line to the relocated power meter. A temporary power line would be laid in conduit on the ground surface to provide temporary power to the facility while the underground power line is removed, and a small generator would supply power to the facility while the power meter is relocated. The existing chain link fence would be extended to enclose the proposed yard expansion area, and all disturbed portions of the radio station yard would be graded and rocked.

The proposed project would temporarily disturb approximately 0.11 acres (4,880 square feet) for construction activities, and permanently disturb approximately 550 square feet to accommodate the yard expansion and new equipment within the limits of previously disturbed BPA fee-owned property. Disturbance would result from the movement of vehicles and heavy equipment, removal of organics/soil/debris, trenching, addition of fill material, and grading. The project site would be accessed from an existing access road from State Highway 4.

Resource Review: BPA reviewed potential impacts to vegetation, wetlands and floodplains, water, federally listed species and critical habitat, and cultural resources by the proposed project.

Existing Environment. The project site is located within Pacific County, WA, on existing BPA fee-owned property north of the City of Naselle. The project site is located on Naselle Ridge northeast of the Naselle River at elevations between 1880 and 1920 feet, and is within the Willapa Bay watershed. The site consists of a communications building, self-supporting steel lattice radio tower, emergency backup fuel cell, a graveled yard enclosed by a chain link fence, and a dirt area for vehicle access during operation and maintenance activities. Vegetated areas of the proposed project site are previously disturbed with evidence of fill and grading. The surrounding landscape includes a conifer forest owned and managed by the Washington State Department of Natural Resources, and several telecommunication facilities.

Vegetation. The project would remove existing vegetation comprised of non-native grasses, weeds, and shrubs. Disturbed areas would be reseeded with a regionally appropriate seed mix and mulched. No sensitive or federally-listed plant species would be affected.

Water, Wetlands, and Floodplains. There are no areas classified as jurisdictional wetlands or 100-year floodplains within the project site. There are no perennial or intermittent streams within the project site. Best management practices (BMPs) would be utilized to prevent erosion and runoff from construction activities from leaving the project site.

Federally Listed Wildlife Species and Critical Habitat. The project is situated adjacent to potentially suitable marbled murrelet (MAMU) habitat and within federally designated MAMU critical habitat. BPA prepared a Biological Assessment (BA) to determine how activities associated with the proposed project would impact MAMU and its critical habitat. On June 21, 2013, BPA initiated informal consultation with US Fish and Wildlife Service (USFWS). BPA determined that the proposed project may affect, but is not likely to adversely affect MAMU, and there would be no effect to MAMU critical habitat. USFWS concurred with this determination in a letter dated July 18, 2013. The proposed project would have no effect on remaining listed species or their critical habitat located in Pacific County because suitable habitat does not exist within the project area.

Cultural Resources. On May 03, 2013, BPA initiated Section 106 consultation with the Washington State Department of Archaeology and Historic Preservation Office (DAHP), the Quinault Indian Nation, and the Shoalwater Bay Tribe. Based on background research and a cultural resource survey, BPA determined the proposed project would have no effect on cultural resources or historic properties. The Washington State DAHP subsequently concurred with BPA's determination in a letter dated July 24, 2013.

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.

Based on the provisions identified on the attachment, 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/ Zachary R. Gustafson
Zachary R. Gustafson
Environmental Project Manager

Concur:

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

Date: August 26, 2013

Attachments:
Environmental Checklist for Categorical Exclusions
Provisions

Provisions

This categorical exclusion will meet the following provisions:

Threatened & Endangered Species

- Conduct all construction activities outside of the marbled murrelet nesting season (nesting season is between April 1st through September 23rd each year).
- Avoid removing any trees. Consult with USFWS and project environmental lead prior to removing any trees if tree removal is deemed necessary.
- Use mufflers on all construction vehicles and equipment which produce noise above ambient levels.
- Shut down all idling construction equipment, if feasible.

Natural Resources

- Implement erosion and sediment control best management practices (BMPs) immediately after clearing and prior to ground disturbing activities to prevent erosion and runoff.
- Do not allow petroleum products, sediment, and other deleterious materials (i.e. concrete wash out) to enter any stream, wetland, waterbody, or drainage conveyance.
- Reseed disturbed areas with a regionally appropriate seed mix and apply mulch.
- Minimize and avoid all unnecessary ground-disturbing and clearing activities.
- Ensure spill containment and cleanup material is readily available at the project site, staging areas, and in construction vehicles and equipment. Replace any used spill response material within 24 hours.

Cultural Resources

In the event any archaeological or historical material is encountered during project activities, the following actions should be taken:

- Stop work in the vicinity and immediately notify the BPA environmental lead, a BPA archaeologist, appropriate BPA project staff, interested Tribes, Washington State DAHP, and the appropriate county, state, and federal agencies.
- Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
- Take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Naselle Ridge Emergency Generator Replacement

Work Order #: 319694

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.

Environmental Resources	No Potential for Significance	No Potential, with Conditions (describe)
1. Historic Properties and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Conduct all construction activities outside of the marbled murrelet nesting season (nesting season is between April 1st through September 23rd each year). • Avoid removing any trees. Consult with US Fish & Wildlife Service and project environmental lead prior to removing any trees if tree removal is deemed necessary. • Use mufflers on all construction vehicles and equipment which produce noise above ambient levels. • Shut down all idling construction equipment, if feasible. • Minimize and avoid all unnecessary ground-disturbing and clearing activities. 		
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 type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed: /s/ Zachary Gustafson

Date: August 26, 2013