

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: Steel Lattice Transmission Tower Inspection, Repair, and Treatment Project

PP&A No.: 3,520

Project Manager: Kevin Machtelinckx - TELM-TPP-3

Location: Clark County, WA; Cowlitz County, WA; Douglas County, WA

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):

B1.3 Routine Maintenance

Description of the Proposed Action: BPA is proposing to conduct an inspection, repair, and treatment project at three steel lattice structure sites on three different transmission lines. The towers are structure 22/2 of the Bonneville PH1-Alcoa # 2 transmission line, structure 6/8 of the Cardwell-Cowlitz #1 line, and structure 1/5 of the Columbia - Ellensburg #1 line. The action is to address potential corrosion of the buried steel footings, which may be impacting the structural integrity of the towers and putting the transmission lines at risk. The project would involve hand excavation in the immediate vicinity of the steel tower legs to approximately four feet below ground surface, in a radius of approximately three to five feet. The legs would be inspected and corroded material would be removed as necessary. If necessary, steel supports would be bolted onto the legs. An anti-corrosive protective coating would be painted on to the steel. A cathodic protective system would potentially be installed to mitigate future corrosion of the steel. The excavated area would then be backfilled and restored with an appropriate seed mix.

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, July 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.



Aaron Siemers
Physical Scientist (Environmental)

Concur:

/s/ Sarah T. Biegel
Sarah T. Biegel
NEPA Compliance Officer

Date: June 6, 2017

Attachment(s):
Environmental Checklist

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: Steel Lattice Transmission Tower Inspection, Repair, and Treatment Project

Project Site Description

The potential project sites are located on three different BPA transmission lines at three steel lattice structures. The work would be completed in the engineered, compacted backfill footprint that was emplaced during the original construction of the towers. One tower location is in rural Clark County, WA, in the relatively flat, fertile lowlands of the Columbia River valley. One tower location is near the banks of the Cowlitz River near the confluence with the Columbia River in Cowlitz County, WA, and the third tower location is near the banks of the Columbia River, east of the Cascades, in Douglas County, WA. Additional location information is detailed below:

Township		Range		Section
1	N	4	E	40
7	N	2	W	11
21	N	22	E	21

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

BPA archaeology staff consulted with the Confederated Tribes of the Grand Ronde, the Cowlitz Tribe, the Confederated Tribes of the Colville Reservation, and the Washington Department of Archaeology and Historic Preservation (DAHP). A “no adverse effect” determination was made for impacts to cultural resources and historic properties, and BPA received a letter of concurrence from DAHP on April 26, 2017. In an email dated November 25, 2016, the Confederated Tribes of the Colville Reservation requested archaeological monitoring at tower 1/5 of the Columbia - Ellensburg #1 transmission line. No additional correspondence was received from the other consulted parties during the mandatory 30-day review and comment period. Therefore, according to Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA’s consultation requirements have been fulfilled.

Due to the presence of cultural resources at tower 1/5 of the Columbia - Ellensburg #1 transmission line, a BPA archaeological monitor would be present during all ground-disturbing activities.

2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
-----------------------------	-------------------------------------	--------------------------

Explanation:

The project would have minimal soil disturbance. All disturbed soil will be backfilled and compacted upon project completion.

3. **Plants** (including federal/state special-status species)



Explanation:

No special-status species are known to be present at the work sites. Federal and State threatened/endangered plant data show no presence of threatened/endangered species. Work would be conducted in an existing transmission line right-of-way (ROW). Soil disturbance would be isolated around steel lattice legs, and conducted with hand tools. The sites would be reseeded upon backfill with a climate appropriate seed mix. The project has no potential to affect special-status plants.

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



Explanation:

A streaked horned lark population, and streaked horned lark habitat, is documented within 500 feet of structure 6/8 of the Cardwell-Cowlitz #1 transmission line. No other special-status species are known to be present in the other work sites, and no designated habitat is present in the actual work areas. Work would be conducted in an existing transmission line ROW with hand tools. Structure sites would be accessed with small trucks and ATVs. Soil disturbance would be isolated around steel-lattice legs. Work crews would be briefed on the nearby streaked horned lark population and cautioned to remain on existing access roads and near the structure site. The project has no potential to affect endangered species and other wildlife.

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



Standard erosion control BMPs would be implemented and no riparian habitat would be affected. No endangered fish-bearing streams would be impacted by the project.

6. **Wetlands**



Explanation:

Structure 6/8 of the Cardwell-Cowlitz #1 transmission line is located approximately 80 ft. from an area listed in the National Wetland Inventory. However, no wetlands would be permanently or temporarily impacted by project activities. No additional fill material would be emplaced at the work sites, so permitting or notification to regulatory agencies is not required. Standard erosion control BMPs would be implemented

7. **Groundwater and Aquifers**



Explanation:

No new wells or use of ground water is proposed. Maximum ground disturbance would be 4 feet.

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



Explanation:

Existing land use would not be affected. All the work is within the BPA right-of-way, and no specially designated areas are present.

- | | | |
|--|-------------------------------------|--------------------------|
| 9. Visual Quality | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>Explanation:</u>
All excavations are located around steel tower legs. There would be no impacts to visual quality from the scope of work. | | |
| 10. Air Quality | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>Explanation:</u>
The project would involve hand-digging, inspection, and repair near steel-lattice transmission towers. There would be no significant impacts to air quality from the scope of work. | | |
| 11. Noise | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>Explanation:</u>
The project would involve hand-digging, inspection, and repair near steel-lattice transmission towers. There would be no significant impacts to ambient noise from the scope of work. | | |
| 12. Human Health and Safety | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>Explanation:</u>
Workers on the project would follow a safety plan. In addition, the proposed project would reinforce the structural integrity of the towers and preserve reliability of the transmission lines. | | |

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, if necessary: NA

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary: NA

- 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, if necessary: NA

- 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, if necessary: NA

Landowner Notification, Involvement, or Coordination

Description: The proposed project is located on private and public land. BPA would continue ongoing coordination with the landowners.

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

Signed: /s/ Aaron Siemers

Aaron Siemers

Environmental Protection Specialist

Date: June 6, 2017