

**NEPA REVIEW SCREENING FORM**  
**for Actions Included in CXs**

Document ID #:  
DOE/CX-00166

**I. Project Title:**

Removal of C9-L3 Electrical Powerline from 100-H Area to the Hanford Town Site

**II. Describe the proposed action, including: location, time period over which proposed action will occur, project dimension (e.g., acres displaced/disturbed, excavation length/depth), area/location/number of buildings. Attach maps and drawings, as applicable. Describe existing environmental conditions and potential for environmental impacts from the proposed action. If the proposed action is not a project, describe the action or plan.**

1.0 PROPOSED ACTION

The U. S. Department of Energy Richland Operations Office (DOE-RL) proposes to remove the River Road electrical powerline (C9-L3) from 100-H Area to the Hanford Town Site (see Figure 1). All electrical services have been disconnected and the powerline is no longer used. There is no foreseeable need for the powerline.

Poles, guy wire anchors, and associated hardware would be removed along the 11.5 mile utility corridor that runs along existing paved, graveled, and unimproved service roads (referred to hereafter as the project area). No new roads would be required. Excavation to remove poles and guy wire anchors would occur up to 6 feet in depth and 2 feet in diameter. No equipment laydown or staging areas would be established along the utility corridor. Removed materials would be placed in containers (referred to hereafter as waste containers) and managed daily for reuse, recycling, or onsite disposal in Hanford's Environmental Restoration Disposal Facility (ERDF).

The Hanford Comprehensive Land Use Plan (CLUP) Environmental Impact Statement (HCP-EIS, DOE/EIS-0222) establishes land use designations, maps, policies, and procedures for the site. Section 6.3.5 of the HCP-EIS indicates existing utility corridors that are not in service, not clearly delineated, and not of defined width are considered "nonconforming uses" that are to be removed. The proposed action is consistent with the HCP-EIS and would be environmentally beneficial by returning the utility corridor to a natural revegetated state restoring ecosystem connectivity fragmented by the utility corridor.

2.0 AFFECTED ENVIRONMENT AND OTHER CONSIDERATIONS

2.1 Ecological Resources (ECR-2017-105)

Mission Support Alliance (MSA) Ecological Monitoring and Compliance performed a survey of the project area on October 18, 2016. The project area was divided into eight sections based on differences in dominant vegetation types or major road intersections (see Figure 1). Detailed descriptions of the ecological resources observed and mitigation measures based on the Hanford Site Biological Resources Management Plan (BRMP, DOE/RL-96-32, Revision 2) habitat levels found in each section are provided in MSA-1703735, Ecological and Cultural Clearance for Removal of C9-L3 Line from 100-H Area to the End of the Line at the Hanford Townsite, Hanford Site, Benton County, Washington (HCRC-2017-100-002, ECR-2017-105).

Native and non-native plant and animal species were observed in all sections. The project area contains both BRMP level 4 and 5 ecological resources. The BRMP level 4 ecological resources would be preserved through avoidance or minimization. BRMP level 5 ecological resources are irreplaceable and would be preserved through avoidance.

The following mitigation measures would be implemented to preserve BRMP level 4 and 5 ecological resources:

- Project vehicles would remain within the boundaries of paved, graveled, and unimproved service roads.

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- Waste containers would be staged on or along paved or graveled roads adjacent to the powerlines or in predominantly cheatgrass areas.
- Pole removal would take place by equipment parked on paved, graveled, or unimproved roads; size reduction required to place poles in waste containers would take place on paved roads.
- Existing revegetated areas would be avoided. If work in revegetated areas is unavoidable, then disturbance would be minimized and disturbed areas would be revegetated in accordance with Hanford Site Revegetation Manual (DOE/RL-2011-116, Revision 1) requirements.

No plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by Washington State as threatened or endangered were observed in the project area. However, the project traverses several areas identified as high quality habitats in the BRMP (i.e., level 4 and 5 ecological resources). Impacts to high quality habitats would be avoided or minimized using mitigation measures identified above.

The BRMP strategy for mitigation is a series of prioritized actions to reduce or eliminate adverse impacts to biological resources including avoidance, minimization, onsite rectification, and compensation. The proposed action reduces options for avoidance and minimization as mitigation strategies. The focus of post-project mitigation would be onsite rectification as required by the BRMP and Hanford Site Revegetation Manual.

For the purposes of estimating ecological resource impacts, a 30-foot wide corridor was applied to the project area. Table 1 provides estimates of ecological resource impacts from the proposed action and required mitigation. Because much of the project area is adjacent to established paved and graveled roads this estimate represents upper bounding mitigation requirements. An impact assessment would be performed by MSA Ecological Monitoring and Compliance at the completion of the project to quantify the actual impacts and resulting mitigation requirements. In addition, MSA Electrical Utilities Project Management would notify MSA Ecological Monitoring and Compliance upon completion of the proposed action to prepare a revegetation plan for impacted areas.

Birds can nest in the project area on the ground, buildings, or equipment. The bird nesting season on the Hanford Site is typically from mid-March to mid-July. Personnel working on this project would be instructed by MSA Electrical Utilities Project Management to watch for nesting birds. If any nesting birds (if not a nest, a pair of birds of the same species or a single bird that will not leave the area when disturbed) are encountered or suspected, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed within the project area, then MSA Electrical Utilities Project Management would contact MSA Ecological Monitoring and Compliance to evaluate and take appropriate action.

All existing roads not needed for continued project use, access, or safety considerations would be restored by removing road surface material and replanting using locally derived native plant species in accordance with the Hanford Site Revegetation Manual. Restored roads would be counted towards mitigation requirements. No adverse ecological resource impacts are anticipated from the proposed action. Mitigation measures described above would be followed to avoid, minimize, and rectify impacts on BRMP level 4 and level 5 ecological resources, and existing revegetated areas. Any changes in the scope of the proposed action that could result in disturbances outside the project area would require additional ecological resources review.

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2.2 Cultural Resources (HCRC-2017-100-002)

A Cultural Resources Review of the project area was conducted by the MSA Cultural and Historic Resources Program (MSA-1703735). An Area of Potential Effect (APE) notification was sent to the Washington State Historic Preservation Office (SHPO) and regional Tribes on January 13, 2017. A cultural resources survey was conducted on March 7 and 8, 2017. Three new sites were recorded during the archaeological survey. Cultural materials were recorded and data was compiled into three new Washington State Archaeological Inventory Forms. These three sites are not eligible for inclusion in the National Register of Historic Places (NRHP). A Cultural Resources Review (CRR), with a finding of No Historic Properties Affected, was prepared and submitted to the SHPO and regional Tribes for a 30-day comment period on May 24, 2017. The SHPO concurred with the findings of the CRR on June 6, 2017. DOE-RL provided a notice of compliance with Section 106 of the National Historic Preservation Act for the proposed action on July 27, 2017.

To ensure the proposed action does not significantly affect the NRHP eligible sites previously recorded within the APE, the NRHP eligible historic districts, the pre-contact archaeological sites located within 500 meters of the APE, or any pre-contact travel routes within the APE, MSA Electrical Utilities Project Management would implement the following mitigation measures:

- Archaeological monitoring would be performed for all project activities that involve ground disturbance.
- DOE-RL Cultural Resources Awareness Training would be provided by the MSA Cultural and Historic Resources Program to all project personnel.

No impacts to cultural resources are anticipated. Any changes in the scope of activities that could result in disturbances outside the APE boundary would require additional cultural resources review.

Although no impacts to cultural resources are anticipated, all workers would be directed by MSA Electrical Utilities Project Management to watch for cultural materials (e.g., bones, stone tools, mussel shell, cans, and bottles) during all work activities. If any cultural materials are encountered, work in the vicinity of the discovery would stop until a MSA Cultural and Historic Resources Program archaeologist has been notified, the significance of the find assessed, appropriate Tribes notified, and arrangements made for mitigation of the find, as necessary.

2.3 Waste Materials Management

Although not in a posted radiologically contaminated area, electrical powerline components removed under the proposed action would be surveyed for radiological release in accordance with Hanford Site policy and procedures. Once released, much of the wood and metal components would be returned to the MSA Electrical Utilities laydown yard in 200 East Area of the Hanford Site for reuse, recycle, or disposal. Non-releasable wood and metal components would be staged in "Radioactive Material Area" (RMA) SS-082 in 200 West Area of the Hanford Site for eventual disposal in ERDF.

Steel insulator rods, bell insulators, and insulator support brackets typically contain lead and are subject to regulation for disposal in accordance with Resource Conservation and Recovery Act (RCRA) and other requirements (e.g., Toxic Substances Control Act).

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These lead-containing components would be managed for disposal at ERDF. This would include use of Satellite and 90-Day Accumulation Areas pursuant to RCRA waste management requirements. Waste containers of lead-containing components would be macro-encapsulated at ERDF to meet Land Disposal Restriction (LDR) requirements found at 40 CFR 268, Subpart D, "Treatment Standards." These types of materials are routinely sent to ERDF for treatment and disposal. An ERDF waste profile exists for management of the materials. A "Waste Planning Checklist" would also be prepared to facilitate waste materials handling and disposal. The ERDF is designed, constructed, licensed and permitted to receive wastes generated under RCRA and CERCLA authority.

**3.0 CONCLUSION**

This is an Activity-Specific Categorical Exclusion based on the provisions of 10 CFR 1021, Subpart D, Appendix B, Categorical Exclusion B4.10, "Removal of Electric Transmission Facilities," and only applies to the proposed action described herein. Any changes to the proposed action or future requests for removal of electrical transmission lines and facilities would be evaluated on a case-by-case basis.

**III. Applicable Reviews (attach to NRSF):**

Biological Review Report #: ECR-2017-105

Cultural Review Report #: HCRC-2017-100-002

**Additional Attachments:**

FIGURE 1 - Aerial Photograph of the Project Area

TABLE 1 - Project Area Ecological Resource Impacts and Mitigation Summary

**IV: Existing Documentation:**

Are the impacts of the proposed action evaluated in a previous EA, EIS, or CERCLA document?

Yes  No

If "YES", use Site Form ~~A-6006-948~~, *Actions Adequately Evaluated in NEPA or CERCLA Document*

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**V. Categorical Exclusion:**

Does the proposed action fall within a category of actions that is listed in Appendixes A or B to Subpart D of 10 CFR 1021? If extraordinary circumstances or integral elements would preclude the use of a CX, check "No".	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the proposal connected to other actions with potentially significant impacts or result in cumulatively significant impacts (not precluded by 40 CFR 1506.1 or 10 CFR 1021.211)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
List CX to be applied and complete Categorical Exclusion Integral Elements (where an action might fit within multiple CXs, use the CX that best fits the proposed action): 10 CFR 1021, Subpart D, Appendix B, Categorical Exclusion B4.10, "Removal of Electric Transmission Facilities"	

**Categorical Exclusion Integral Elements:**

Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, or health, including DOE and/or Executive Orders?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the proposed action disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the proposed action adversely affect environmentally sensitive resources?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the proposed action involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species such that the action is not contained or confined in a manner designed, operated, and conducted in accordance with applicable requirements to prevent unauthorized release into the environment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If "NO" to all Integral Elements questions above, complete Section VI, and provide NRSF to DOE NCO for review.  
If "YES" to any of the Categorical Exclusion Integral Elements questions above, contact DOE NCO for additional NEPA Review.

**VI. Responsible Contractor Signatures:**

**Initiator:**

Jerry W. Cammann, MSA NARCS

Name

Print

*Jerry W. Cammann*

Signature

11/2/17

Date

**NEPA Subject Matter Expert:**

Jerry W. Cammann, MSA NEPA-SME

Name

Print

*Jerry W. Cammann*

Signature

11/2/17

Date

**VII. DOE Approval/Determination**

DOE NEPA Compliance Officer: Marla K. Marvin, Office of Chief Counsel, NEPA Compliance Officer (NCO)

Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), the proposed action fits within the specified class of action:

NCO Determination:    CX

\*NCO Recommendation:    EA    EIS

*Marla Marvin*

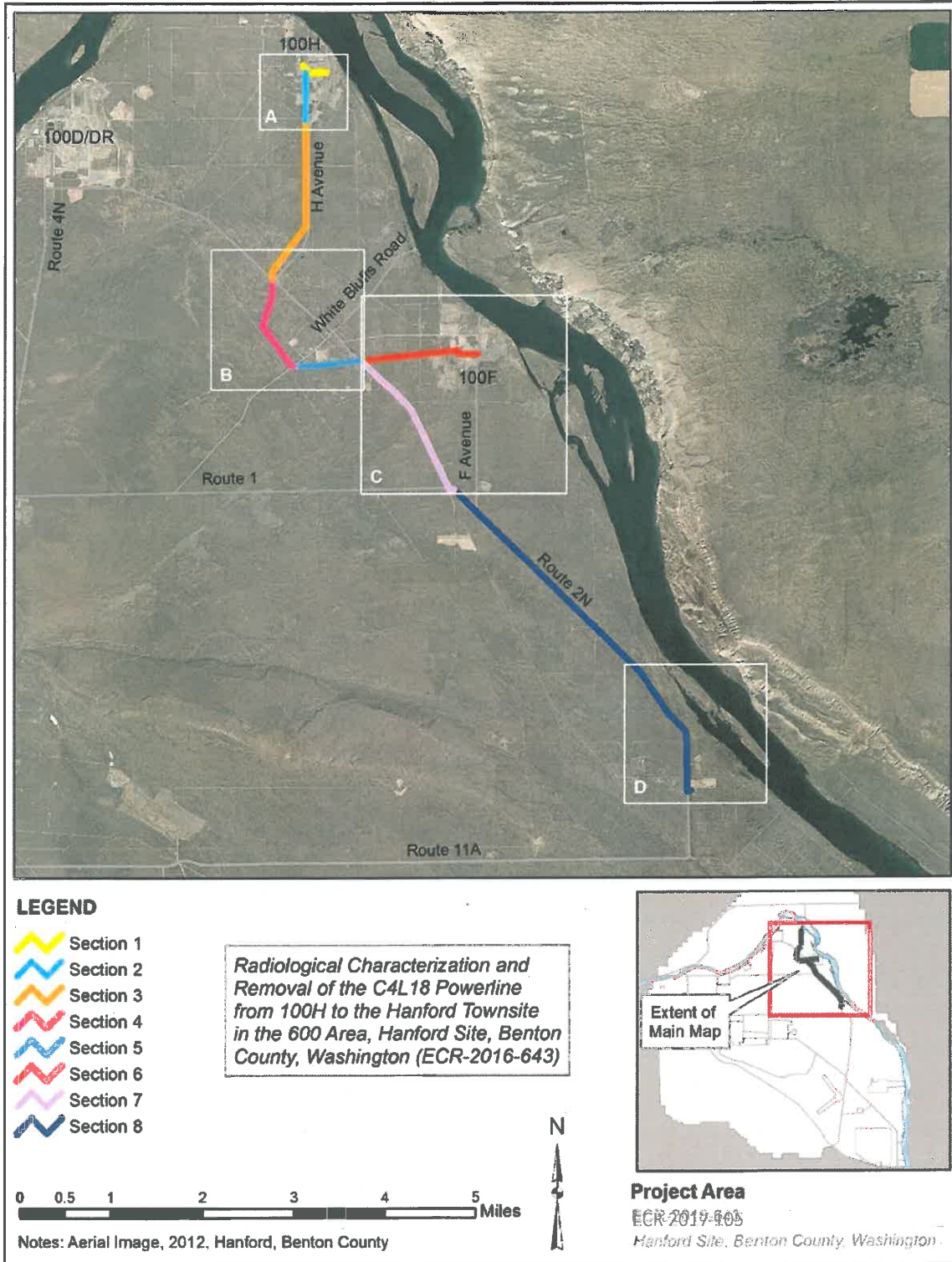
Signature

11/3/17

Date

\*NRSF A-6006-950 would be completed by responsible contractor

Figure 1. Aerial Photograph of the Project Area





**Table 1. Project Area Ecological Resource Impacts and Mitigation Summary**

<b>BRMP Habitat Resource Level</b>	<b>Area within 30 ft. buffer of project (acres)</b>	<b>Compensatory Mitigation Ratio (Quantity or Quality)</b>	<b>Compensatory Mitigation Away from Site (acres)</b>
0	5.4	Not Required	N/A
1	8.3	Not Required	N/A
2	2.1	1:1	2.1
3	16.4	3:1	49.2
4	9.3	5:1	46.5
5	2.0	Case-by-Case Basis	TBD
		TOTAL	97.8 +