

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Advanced Drainage Systems, Inc. Land Use Agreement

Project Manager: Woolson, Paul B. TERR/Olympia

Location: Thurston County, WA

| Line Section | Township | Range | Section | County | State |
|------------------|----------|-------|---------|----------|-------|
| Paul-Satsop 21/4 | 17 N | 02W | 5 | Thurston | WA |

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.9 Multiple Use of Powerline Rights-of-Way

Description of the Proposed Action: Bonneville Power Administration is permitting the lease of a 2.0-acre site to Advanced Drainage System (ADS) on BPA fee-owned property located adjacent to Paul-Satstop 500 kva transmission line, structure 21/4. The lease would provide ADS with overflow storage of used surplus plastic pipe. No hazardous substances would be stored on the leased property. ADS would improve the site in accordance with mitigation measures outlined in the attached categorical exclusion environmental checklist. There would be no additional uses of the leased area.

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.

/s/ Douglas F. Corkran

Douglas F. Corkran
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel
NEPA Compliance Officer

Date: May 21, 2018

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: Advanced Drainage System, Inc. Land Use Agreement

Project Site Description

The proposed parcel is located adjacent to existing Rights-Of-Way and access road on BPA fee-owned land. The area was previously disturbed prior to acquisition by BPA and consists of relatively flat land infested with dense stands of Scots broom.

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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p><u>Explanation:</u> Cultural resource surveys did not identify any historic or cultural resources within the proposed lease area. The site is in a low probability area for cultural resources. If any cultural materials are encountered during the implementation process, all work shall halt and notifications must be made to BPA archaeologists. No impacts to historic or cultural resources are expected.</p> | | |
| 2. Geology and Soils | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p><u>Explanation:</u> The site has gravelly soils, some of which would be excavated and graded as required. After level grading, clean gravel would be spread prior to use. Any disturbed area that is not covered by gravel would be seeded with grass as required to minimize erosion. The site is flat so no off-site movement of sediments is expected. Impacts to geology and soils are expected to be very low, assuming that the site is graveled and seeded.</p> | | |
| 3. Plants (including federal/state special-status species) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p><u>Explanation:</u> There are no known sensitive or listed plant populations within the parcel. The majority of the current vegetation is dense Scots broom which does not support viable habitat for sensitive or listed plant species. No impacts to sensitive or listed plant populations or individuals are expected.</p> | | |
| 4. Wildlife (including federal/state special-status species and habitats) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p><u>Explanation:</u> Critical habitat for the Oregon spotted frog is present 150 feet south of the parcel. Any excess soil from grading would be discarded to the north of the project location to minimize any chance of water quality degradation. The site is flat and the soils appear highly permeable (gravelly soils), so any site runoff is not expected to move into spotted frog habitat. However, any excess soil or disturbed areas would be seeded to minimize off-site transportation of materials that could potentially degrade water quality and harm spotted frogs. All other debris would be discarded off-site at an approved waste facility as needed. A site visit to look for signs of Mazama pocket gopher was conducted in May 2018. No burrows were observed and the presence of dense stands of Scots broom made their presence unlikely. Overall, the impacts to wildlife from the project are expected to be minimal to none, assuming that disturbed or excess soils are seeded and other debris are discarded off site.</p> | | |

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

Explanation: No habitat is present within the immediate proximity of the project location. An intermittent creek is located over 650 feet away from the project area. All work would be performed upland and away from riparian and wetland areas. No impacts to water bodies, floodplains, and fish are expected.

6. **Wetlands**

Explanation: No wetlands are present on the site. The nearest wetland is a forested wetland located approximately 150 feet south of the project. The level topography of the site would limit potential inadvertent stormwater runoff, although in rare cases some runoff may occur during extreme weather events. Grading the site even more level than it already is, and installing a permeable surface would further help localize any runoff. Additionally, inventory and chain of custody encompassing any materials that could be present from piping stored on site needs to be documented and retained for the entire lease agreement. All material being stored on this site would be clean and contain no hazardous substances. No impacts to wetlands are expected if the following measures are implemented: grading the site level, placing gravel, not allowing any hazardous substance to be stored or used on site, and maintaining chain of custody records for materials stored there.

7. **Groundwater and Aquifers**

Explanation: No new wells or use of groundwater is proposed. No hazardous materials would be stored on site. Inventory and chain of custody encompassing any materials that could be present from piping stored on site need to be documented and retained for the entire lease agreement. All material being stored on this site would be clean and contain no hazardous substances. No impacts to groundwater and aquifers are expected if the following measures are implemented: not allowing any hazardous substance to be stored or used on site, and maintaining chain of custody records for materials stored there.

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

Explanation: The parcel is located adjacent to existing ROW and access road, and to the existing drainage pipe manufacturing and storage yard. The new use of BPA ROW would not impact existing or future land uses in the project vicinity.

9. **Visual Quality**

Explanation: The lease area is located near existing access roads and industrial properties. The proposed action would not alter or affect visual quality.

10. **Air Quality**

Explanation: Any fugitive dust or vehicle emissions generated during project implementation would be temporary and negligible. Gravel and other BMPs would be used to minimize fugitive dust and sediment movement from the project site as needed.

11. **Noise**

Explanation: Construction noise would be temporary and localized during daylight and normal business hours.

12. **Human Health and Safety**

Explanation: The proposed action is located adjacent to existing ROW and access road. No houses are located nearby. The proposed use of the property would not adversely impact human health or safety.

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:

- 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:

- 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:

- 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:

Landowner Notification, Involvement, or Coordination

Description: BPA Realty would make the necessary landowner notifications. Proper documentation and chain of custody of all materials being stored on Federal land must be filed and retained by Advanced Drainage Systems, Incorporated for the entire lease duration. This information would be shared and filed with BPA at regular intervals. Materials which have potentially been in contact with known hazardous substances would not be permitted to be stored on the leased property.

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

Signed: /s/ Douglas F. Corkran
Douglas F. Corkran ECT-4

Date: May 21, 2018