

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Zayo Dark Fiber; Land Use Review Request (LURR) #20180420

**Project No.:** LURR #20180420

**Project Manager:** Mike Deklyen, TERR-3

**Location:** Clark County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.7 Fiber Optic Cable

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Zayo Group, LLC (Zayo) to connect their existing fiber optic cable (fiber) system to existing BPA-owned fiber. Zayo provides communications services to data centers, wireless carriers, government agencies, and other entities. Zayo would install underground fiber optic cable within BPA fee-owned transmission line rights-of-way in Vancouver, Clark County, Washington. Zayo would connect fiber to two of the fibers they currently lease from BPA to provide an alternate route for their fiber system.

Zayo would install underground fiber within the BPA transmission line corridor that includes the Bonneville - Ross No. 1 and the Bonneville - Ross No. 2 transmission lines. The newly installed fiber would connect to an existing Bonneville fiber enclosure located on the BPA transmission structure numbered Structure 30/1, on the North Bonneville-Ross No. 1 transmission line.

The area where work could occur is the portion of the transmission line right-of-way that is 50 feet to the east and west of Structures 30/1 on both Bonneville - Ross transmission lines. Materials and equipment would be staged on Zayo's contractor trucks and trailers within the work area.

The underground fiber would be installed using a directional drill to bore a tunnel from the existing Zayo fiber system along NE 18<sup>th</sup> Avenue, across the width of the BPA transmission line right-of-way, for a distance of 179.5 feet. The hole would be bored 36 inches in depth and one 48-count fiber cable within 4-inch diameter conduit would be placed in the bore hole. To reach the base of transmission structure Bonneville - Ross No. 1 30/1, a trench up to 36 inches in depth would be dug for the remaining 43 feet. The fiber would be placed in the trench in a 4-inch diameter conduit. Zayo would install an underground concrete fiber vault (4-foot by 4-foot by 4-foot) at the base of Structure 30/1. An estimated 563 cubic feet of material would be excavated to bore and trench for the fiber conduit and to install the fiber vault.

A continuous strand of fiber would run from the Zayo fiber vault through the conduit up to the existing Bonneville fiber enclosure (a fiber splice box mounted on Structure 30/1). To do this, Zayo would position a riser connection (conduit pipe 5 feet in length and 4 inches in diameter) up the east leg of Structure 30/1. BPA would construct the final portion of the riser connection (conduit pipe 10 feet in length and 4 inches in diameter) to the BPA fiber enclosure. Once the fiber is spliced together in the Zayo fiber vault and the BPA fiber enclosure, the fiber connection would be complete.

**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/ Kimberly St.Hilaire

Kimberly St.Hilaire

Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

Date: February 19, 2019

Attachment(s):

Environmental Checklist

Cultural Resources Inadvertent Discovery Plan

# 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.

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## Project Site Description

The transmission line corridor in the Project area is fairly level, undeveloped land adjacent to a residential area on the south side and NE 18th Avenue. The undeveloped right-of-way is vegetated with native shrub species with an understory of non-native grasses and native and non-native flowering plants. Native shrubs include snowberry (*Symphoricarpos albus*), thimbleberry (*Rubus parviflorus*), and trailing blackberry (*Rubus ursinus*). Herbaceous species include some native species, including lupines (*Lupinus sp.*) and goldenrod (*Solidago sp.*), and non-native weeds, including thistles (*Cirsium sp.*) and St. John's wort (*Hypericum perforatum*).

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> BPA conducted consultation under Section 106 of the National Historic Preservation Act (NHPA) with the Washington Department of Archaeology and Historic Preservation (DAHP) and with two tribes, the Cowlitz Indian Tribe and the Confederated Tribes of the Grande Ronde. DAHP and the tribes were informed of the Project and provided an opportunity to provide information on the Project Area of Potential Effects (APE). BPA conducted a cultural resources field survey and did not find cultural resources within the APE. The field survey report was provided to DAHP and consulting tribes for a 30-day review period. DAHP concurred with BPA's determination of No Adverse Effect for the Project (January 3, 2019, letter to BPA) and consulting tribes did not comment. The following protocols would be implemented to avoid impacts to any undiscovered cultural resources and to ensure that proper procedures are followed if any cultural resources are discovered during Project construction:</p> <ul style="list-style-type: none"><li>✓ All construction workers, including Zayo's contractors and BPA, would implement the attached Inadvertent Discovery Plan.</li></ul>		
2. <b>Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Soils would be compacted by heavy equipment and some soils would be excavated. To minimize disturbance to soils, the following best management practices would be implemented:</p> <ul style="list-style-type: none"><li>✓ Confine work to the work area which is defined as the portion of the transmission line corridor that extends 50 feet to the east and 50 feet to the west of Structures 30/1 on both Bonneville - Ross transmission lines.</li><li>✓ Zayo would stage materials and equipment on Zayo's contractor's trucks and trailers within the work area and BPA would stage within the defined work area.</li><li>✓ Stockpile excavated topsoil separately from subsoil; subsoil would be used to refill the excavated areas and the stockpiled topsoil would be spread in the top foot of soil.</li><li>✓ Any remaining excavated material would be removed from the right-of-way and placed in an acceptable upland area.</li></ul>		

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



Explanation: Three ESA-listed plant species are on the US Fish and Wildlife Service list for Clark County:

- Golden Indian paintbrush (*Castilleja levisecta*) is an endangered species that grows in upland native prairie that is undisturbed.
- Water howellia (*Howellia aquatilis*) is a threatened aquatic annual that grows in wetlands.
- Bradshaw's lomatium (*Lomatium bradshawii*) is an endangered species that grows in native wet prairie.

A BPA Environmental Protection Specialist visited the Project area on August 17, 2018, to determine if suitable habitat is present for these species. This area does not provide suitable habitat for these ESA-listed plant species because there are no wetlands and the area lacks the characteristics of relatively undisturbed native prairie. A small amount of vegetation would be permanently removed for the installation of the fiber vault and other impacts to vegetation are expected to be temporary. Best management practices would be followed as described under #2, Soils and Geology above and by implementing the following measures:

- ✓ Confine soil disturbance to the smallest possible area within the Project work area.
- ✓ Where possible cut or crush vegetation, rather than by removing vegetation
- ✓ Reseed areas disturbed by construction with a native seed mix (would be done by BPA).

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



Explanation: Common wildlife species, typically found in suburban areas are expected to occur within the Project area. Two federal ESA-listed wildlife species are on the US Fish and Wildlife Service list for Clark County: northern spotted owl (*Strix occidentalis caurina* - threatened) and gray wolf (*Canis lupus* - endangered). The Project area is primarily a suburban area within the Vancouver metropolitan area and does not include undisturbed wildlife habitat. Because large tracts of forest are not available in the Project area for nesting and feeding, the Project would have no effect upon northern spotted owl. Because the suburban environment in the Project area does not support adequate undisturbed habitat for gray wolf, the proposed Project would have no effect upon the gray wolf. A small amount of wildlife habitat would be permanently removed for the installation of the fiber vault and other impacts to wildlife habitat are expected to be temporary. Best management practices would be followed as described under #2, Soils and Geology and #3, Vegetation, above.

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



Explanation: There are no waterways in or near Project work areas; the closest waterway is an intermittent stream about 900 feet east of Project work areas. Because there are no waterways within or near the Project site, there would be no effect to water bodies and fish species. The Project area is not within a floodplain.

6. **Wetlands**



Explanation: There are no wetlands mapped in the Project work area according to National Wetland Inventory (NWI) data. The nearest NWI wetland is about one-half mile northeast of the Project site. A BPA Environmental Protection Specialist conducted a site visit of the Project area on August 17, 2018, and verified the work area is upland because wetland hydrology, soils, and vegetation are not present.

7. **Groundwater and Aquifers**



Explanation: The small area of excavation would not affect groundwater quality or quantity or groundwater recharge.

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



Explanation: The BPA-owned right-of-way is within a residential area and it has no special land use designations.

9. **Visual Quality**



Explanation: The fiber equipment that would be added is minimal and would be similar to equipment already found on the transmission line structures. There would be no obvious changes in the way the transmission line appears to an observer.

10. **Air Quality**



Explanation: The Project would not result in additional particulate matter and the exhaust generated by equipment during the short period of construction would not violate air quality standards.

11. **Noise**



Explanation: Work would occur during the day along a busy street. The noise generated by boring, trenching, and excavating equipment would be temporary.

12. **Human Health and Safety**



Explanation: Work would be conducted on BPA-owned right-of-way in an area with no nearby public uses.

### **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:

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### **Landowner Notification, Involvement, or Coordination**

Description: Landowner coordination was not conducted because all work would be conducted in an existing transmission line corridor owned by BPA and construction work would be limited in duration.

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

Signed: /s/ Kimberly St.Hilaire

Kimberly St.Hilaire

Environmental Protection Specialist

Date: February 19, 2019