



U.S. Department of Energy Hanford Site

DOE/EA-2158

FINDING OF NO SIGNIFICANT IMPACT Use of Midway Substation Road on the Hanford Site, Washington by Grant County Public Utility District for its Priest Rapids Hydroelectric Project

AGENCY: U.S. Department of Energy, Richland Operations Office

ACTION: Finding of No Significant Impact

SUMMARY: The U.S. Department of Energy (DOE), Richland Operations Office (RL) is adopting an Environmental Assessment (EA) prepared by the Federal Energy Regulatory Commission (FERC) pursuant to the Council on Environmental Quality Regulations (*Code of Federal Regulations* [CFR], Title 40, Parts 1500 through 1508) for implementing the National Environmental Policy Act (NEPA) (42 *United States Code* [USC] Section 4321 *et seq.*). The Grant County Public Utility District (GCPUD) submitted a request to FERC to amend its license for the Priest Rapids Dam to perform seismic upgrades for the right embankment of the dam.

FERC's EA was prepared for the FERC's federal action of amending the hydroelectric license for the dam. The Priest Rapids Dam is not located on the Hanford Site but the Midway Substation Road, which GCPUD proposes to use for up to two years as one of its access routes to its construction site, is located on Hanford. Thus, RL's federal action is to decide whether to allow use of Midway Substation Road ("the road") by GCPUD for its project.

FERC's EA evaluated potential environmental impacts associated with constructing improvements for the right embankment, including potential traffic and road impacts on the Hanford Site. The EA is titled *Amending License to Modify Right Embankment of the Priest Rapids Dam, Priest Rapids Hydroelectric Project—FERC Project No. 2114-303 Washington*. DOE/RL coordinated with the GCPUD and FERC during the NEPA process and EA review and preparation. As explained in the previous paragraph, RL's jurisdiction and review is related to the road, and not the hydroelectric project located off the Hanford Site.

Analyses related to the potential impacts from construction vehicle use of the road are contained in the FERC's EA, which RL adopts and incorporates herein by reference (DOE/EA-2158). The EA examines potential environmental impacts of the Proposed Action and concludes that the impacts related to traffic and road impacts would be minor, and mitigation measures would reduce potential impacts (see Mitigation Measures on the next page).

RL reviewed the FERC's Draft EA and submitted comments to FERC requesting additional considerations regarding use of the road, which is not designed for sustained heavy construction vehicle use and which has many users of the road. In response, FERC included in its Final EA and Order amending the GCPUD's license, requirements that the GCPUD provide an *Access*

Road Repair and Replacement Plan, coordinate the plan with RL, and provide the plan to FERC for review and approval.

RL found that the EA adequately met DOE requirements but, did not include a discussion of Intentional Destructive Acts per DOE policy (DOE Memorandum, Office of NEPA Policy and Compliance, December 1, 2006). Therefore, DOE is including a discussion of Intentional Destructive Acts in this Finding of No Significant Impact (FONSI). Based on the analysis in FERC's EA and Order, RL has determined that its action to allow use of the road does not constitute a major federal action significantly affecting the quality of the human environment within the meaning of NEPA. Therefore, an environmental impact statement is not required.

PURPOSE AND NEED: The Purpose and Need for the GCPUD's project at Priest Rapids Dam is to provide necessary seismic upgrades to meet safety standards and is explained in detail in the FERC's EA. The GCPUD's proposed access routes, of which DOE/Hanford's Midway Substation Road is one, are also addressed in the EA.

PROPOSED ACTION: RL's FONSI is not for the Proposed Action, which is the seismic upgrade of the right embankment of Priest Rapids Dam by GCPUD. RL's federal action is to decide whether to allow the use of the road as one of the access routes for GCPUD's construction vehicles.

NO ACTION: The No Action Alternative "would not address the high-priority seismic hazard identified in the 2007 Probabilistic Seismic Hazard Assessment. The no-action alternative does not meet current Commission dam safety requirements." (FERC Final EA, page 13).

ENVIRONMENTAL CONSEQUENCES: The analysis of potential environmental consequences in the EA is incorporated herein by reference. Please see FERC's Final EA for the analyses regarding all subject areas.

MITIGATION MEASURES: The following mitigation measures related to the road from FERC's EA and Order are included in RL's FONSI:

Final EA, relevant excerpt, page 46: *...the Commission would require Grant PUD to file an Access Road and Replacement Plan, if necessary, to repair and modify the DOE and Army YTC access roads for Commission review and approval. In addition, the Commission would also require Grant PUD to provide documentation of its consultation in the development of the plan. This work would occur within the existing footprint of the roadway for the DOE section of the road, up to the full depth of the roadway cross section. The existing paved road surface will then be prepared, and chip-sealed (asphalt is applied, then coated with gravel, before being rolled to combine the layers). Upon completion of the chip seal coat, any loose asphalt will be swept off and after the appropriate cure time a seal coat applied (asphalt sand mixture). Construction impacts will be limited to within 30 feet of the roadway, and no excavation is proposed beyond the extent or depth of the existing roadway cross section. Excavation within the roadway cross section will be limited to one foot in depth. Construction impacts beyond the roadway footprint will be limited to construction equipment access/staging along the shoulders of the existing road and will not require any excavation.*

Order Amending License to Modify Right Embankment of the Priest Rapids Dam, January 6, 2021, relevant excerpts, pages 7-12:

23. *The proposed Traffic Control Plan: describes the different project access routes and lists owners for various segments of these routes; identifies existing users and uses of all proposed access routes; establishes a traffic operations plan for all access routes during each phase of construction; and identifies a traffic control strategy to minimize disruptions to access route owners and users. Construction for the project is expected to last 18-24 months and occur during scheduled work hours. In addition, the plan also discusses traffic control strategy. While additional passenger cars and truck traffic would impact those who regularly use the roads near the construction area, the proposed BMPs and Traffic Control Plan would help mitigate adverse effect and manage construction access. However, we recommend that Grant PUD consider any applicable Hanford Site management plan, which include the Hanford Site Revegetation Manual and the Hanford Site Biological Resources Management Plan and comply with the terms of any land use agreement it enters into with DOE.*

24. *In the June 26, 2020 filing, Grant PUD discusses the potential additional postconstruction repair work that would be necessary following construction to completely repair the downstream access road if activities cause damages that cannot be remedied via the methods described in the Traffic Control Plan. The road segments discussed in this filing include those owned by the DOE, Army YTC, and the additional section of the roadway that will be needed to transport other equipment and staff to and from the Cow Creek Quarry.*

25. *This order requires Grant PUD to provide a plan, if necessary, to repair and modify the parts of access roads that was not already considered in the Traffic Control Plan, for Commission review and approval. Grant PUD is also required to provide documentation of its consultation with DOE and Army YTC and other stakeholders in the development of the plan. This plan would address work, if needed, to the DOE and Army YTC access roads.*

30. *In addition, any potential short-term impacts associated with the repair work along the DOE road and maintenance and repair work along the Army YTC road are expected to be minimal, given that they will occur within the existing disturbed footprint and shoulder areas of the existing roadways, and planned implementation of the TESC Plan and SPCC Plan that will minimize potential for erosion created by stormwater and impacts associated with spills from equipment.*

32. *In order to ensure that no significant effects ensue, the final EA concluded that implementing specific measures proposed by Grant PUD including: (1) the Temporary Erosion and Sedimentation Control Plan (ordering paragraph (J)); (2) the Spill Prevention, Control, and Countermeasure Plan (ordering paragraph (F)); (3) the Dust Control Plan (ordering paragraph (G)); (4) the Traffic Control Plan (ordering paragraph (H)); and (5) an Access Road Repair and Replacement Plan (ordering paragraph (I)) would minimize and mitigate for these effects.*

The Director orders:

(F) Spill Prevention, Control, and Countermeasure Plan. At least 30 days prior to the start of construction, the licensee must file, for Commission approval, its Spill Prevention, Control, and Countermeasure Plan. The plan must, at a minimum, describe the licensee's measures to protect soils and water quality from contamination by fuels, lubricants, and other oils by using dedicated storage and refueling areas, and secondary containment. The Commission reserves the right to require changes to the plan. Upon Commission approval, the licensee must implement the plan, including any changes required by the Commission.

(G) Dust Control Plan. At least 30 days prior to the start of construction, the licensee must file, for Commission approval, its Dust Control Plan. The plan, at a minimum, must include a description of: the licensee's methods to monitor levels of airborne dust; proposed actions to

limit dust production from roads, stockpiles, and other disturbed soils; equipment or methods used to limit dust releases from stationary and mobile equipment; and airborne dust thresholds and actions to be taken if monitoring indicates the exceedance of those levels.

The licensee must prepare the plan in consultation with and obtain approval from the Yakima Regional Clean Air Agency. The Commission reserves the right to require changes to the plan. Upon Commission approval, the licensee must implement the plan, including any changes required by the Commission.

(H) Traffic Control Plan. The Traffic Control Plan, included as Appendix D to the licensee's amendment application on May 17, 2019, is approved. The licensee must implement the plan to mitigate impacts to traffic and manage construction access associated with the proposed amendment.

(I) Access Road Repair and Replacement Plan. The licensee must consult with the U.S. Department of Energy (DOE) and the U.S. Army, Yakima Training Center (YTC) during the licensee's use of the parties' access roads. If during the use of these roads the consulted parties determine further repairs caused by the licensee's construction activities are necessary, the licensee must develop an Access Road Repair and Replacement Plan for review and approval by the DOE and YTC. The licensee must file the plan, for Commission review, no later than 15 days after it is approved by the DOE and YTC, and the filing must include evidence of consultation with the DOE and YTC in determining the necessity of, development, and approval of the plan.

CONSIDERATION OF INTENTIONAL DESTRUCTIVE ACTS: The requirement to address Intentional Destructive Acts is a DOE policy but, the proposed project (the hydroelectric project) is not on the Hanford Site. RL's FONSI is related to use of the road for construction vehicles and there is no known history of intentional destructive acts against a DOE road. No significant environmental impacts would be expected from intentional physical damage to the road, and GCPUD is required to repair any road damage from the construction activities.

PUBLIC COMMENT: On September 24, 2020, FERC issued the Draft EA for the proposed amendment for public review. The Draft EA evaluated the potential effects of the proposal and identified environmental measures to mitigate or reduce potential impacts. Comments on the Draft EA were filed by RL on October 23, 2020.

PUBLIC AVAILABILITY AND CONTACT INFORMATION: The RL FONSI and the FERC's Order (which is also FERC's NEPA decision document) and Final EA are available at:

- <http://www.hanford.gov/page.cfm/EnvironmentalAssessments>

For questions about this FONSI or EA:

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For information about the DOE NEPA process:

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Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

<http://energy.gov/nepa/office-nepa-policy-and-compliance>

DETERMINATION:

Based on the analysis in FERC's EA and Order, I have determined that RL's action to issue a license agreement for use of Midway Substation Road to the Grant County Public Utility District, would not constitute a major federal action significantly affecting the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an environmental impact statement is not required, and RL is issuing this FONSI.

Issued in Richland, WA this 18th day of February 2021.



Brian T. Vance, Manager
Richland Operations Office/
Office of River Protection