

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: Osmose Treatment Pilot Project to Inspect and Repair Steel Tower Legs

PP&A No.: 3,520

Project Manager: Kevin Machtelinckx- TELM-TPP-3

Location: Clark County, WA; Cowlitz County, WA; Pierce County, WA; Douglas County, WA; Lincoln County, WA; Marion County, OR; Linn County, OR

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 19 steel-lattice structure sites on nine different transmission lines. 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 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.

/s/ Aaron Siemers

Aaron Siemers
Physical Scientist (Environmental)

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel
NEPA Compliance Officer

Date: October 14, 2016

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.

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Project Site Description

The potential project sites are located at nine different BPA transmission lines at 19 steel lattice structures. The work would be completed in the engineered, compacted backfill footprint that was emplaced during the original construction of the towers. Tower locations range from urban areas to farmed areas, and are generally in relatively flat, lowland topography west of the Cascades in Oregon and Washington. The locations are listed below:

Township		Range		Sections
1	N	4	E	41
7	N	2	W	11
19	N	4	E	9,10
8	N	3	W	25
1	N	3	E	14
21	N	22	E	21
27	N	34	E	31
(OR) 9	S	2	E	29
(OR) 12	S	2	W	24,25,30

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
<p>1. Historic and Cultural Resources</p> <p><u>Explanation:</u></p> <p>BPA archaeology staff reviewed the project, and since all potential ground disturbance would take place in previously disturbed, backfilled soils, the project was deemed to not have potential to impact historic properties.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>2. Geology and Soils</p> <p><u>Explanation:</u></p> <p>The project would have minimal soil disturbance. All disturbed soil will be backfilled and compacted upon project completion.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Explanation:

No special-status species are known to be present at the work sites. Federal & state endangered plant data show no presence of 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 effect special-status plants.

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

Explanation:

No special-status species are known to be present in the work sites, and no designated habitat is present in the work area. Work would be conducted in an existing transmission line ROW. Soil disturbance would be isolated around steel-lattice legs. The project has no potential to effect endangered species or 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:

Two structure sites are located in areas listed in the National Wetland Inventory. However, these sites can easily be approached on foot; standing or flowing water is not present; and water quality would not be impacted by excavation. No additional fill material would be used 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.

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

Explanation:

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

9. **Visual Quality**

Explanation:

All excavations are located around steel-tower legs. There would be no impacts to visual quality from the scope of work.

10. **Air Quality**

Explanation:

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**



Explanation:

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**



Explanation:

Workers on the project would follow a safety plan. The project would not negatively impact human health or safety. The proposed work would proactively address potential corrosion of the steel-lattice towers and remove the potential risk associated with 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

Date: October 14, 2016

Aaron Siemers
Environmental Protection Specialist