Allston to Astoria Transmission Line Rebuild Project

Finding of No Significant Impact
Bonneville Power Administration
DOE/EA-2260
December 2024

INTRODUCTION

Bonneville Power Administration (BPA) announces its environmental findings for the Allston to Astoria Rebuild Project (Proposed Action or Project). The Proposed Action includes rebuilding BPA's existing approximately 22-mile-long Allston to Driscoll No. 2 and the approximately 21-mile-long Driscoll to Astoria No. 1, 115-kilovolt transmission lines. The Project would include replacing the existing conductors, H-frame wood and steel pole structures, wood monopoles, selected steel-lattice structures, all hardware, and work within BPA's Allston and Clatskanie Public Utility District's Delena substations. The transmission line rights-of-way would be cleared of some identified vegetation and danger trees would be removed. In addition, access roads would be improved and reconstructed; and a small number of new roads would be constructed.

BPA prepared an environmental assessment (EA) evaluating the Proposed Action and No Action Alternative. BPA solicited and received three comments on the Draft EA (June 2024) and responses to those comments are presented in Appendix C of the Final EA. As a result of public comments, refinements or changes to the Proposed Action and No Action Alternative and refinements or changes to the environmental analysis are presented in the Final EA.

BPA hereby adopts the EA, and based on its analysis and public comments received, BPA has determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act (NEPA) as amended (42 United States Code [USC] 4321 *et seq*.).[1] Therefore, the preparation of an environmental impact statement (EIS) is not required, and BPA is issuing this Finding of No Significant Impact (FONSI) for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS and is not without precedent.

Attached is a Mitigation Action Plan that lists the minimization and mitigation measures and best management practices (BMPs) that BPA is committed to implementing as part of the Project.

PUBLIC AVAILABILITY

A notification of FONSI availability will be distributed to interested parties and other potentially affected parties. The FONSI will be posted on BPA's project website www.bpa.gov/nepa/allston-to-astoria and mailed directly to interested parties who requested a copy.

[1] *BPA is aware of the November 12, 2024, decision in Marin Audubon Society v. Federal Aviation Administration, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, BPA has nonetheless elected to follow those regulations at 40 Code Federal Regulations (C.F.R.) §§ 1500– 1508, in addition to the US Department of Energy's NEPA implementing procedures at 10 C.F.R. Part § 1021, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.*

PROPOSED ACTION

Under the Proposed Action, BPA would rebuild the approximately 22-mile Allston-Driscoll No. 2 and the approximately 21-mile Driscoll-Astoria No. 1, transmission lines in Clatsop and Columbia counties, Oregon. The Project would include replacing structures that support the transmission line and other line components, as well as enhancing the access road system. The rebuild project includes the following activities:

- Replacing the existing conductors.
- Replacing H-frame wood and steel pole structures.
- Replacing all insulators, guy anchors and strands, disconnect switches, and ground wires.
- Installing counterpoise and ground rods for all new and replaced structures.
- Installing fall protection on some existing steel lattice structures and steel monopole structures.
- Clearing vegetation in the transmission line right-of-way (ROW) and removing danger trees.
- Establishing temporary staging areas and material yards, and tensioning sites for pulling and tensioning conductors.
- Reconstructing, improving, and constructing new access roads inside and outside of the ROW, including repair and replacement of gates, construction of a new bridge, repair and installation of fords, repair and installation of culverts, and landslide stabilization.
- Replacing two 115-kV disconnect switches at Clatskanie Public Utility District's (CPUD) Delena Substation on existing structures.
- Replacing one 115-kV disconnect switch with a new wood H-frame dead-end structure and installing a shoo-fly at CPUD’s Clatskanie Tap.
- Installation of three new surge arresters and support structures at the BPA’s Allston substation.

The Project is estimated to start in winter 2025, with work beginning in summer 2025 in areas where there are in-water work restrictions. The Project is expected to be completed in September 2026.

NO ACTION ALTERNATIVE

Under the No Action Alternative, BPA would not rebuild the transmission lines or upgrade access roads as a single coordinated project. Construction activities described under the Proposed Action would not occur. However, the reliability and safety concerns that prompted the need for the Proposed Action would remain. BPA would continue to operate and maintain the existing transmission line in its current condition, replacing failed conductor fittings, replacing aged and rotting structures as they deteriorate, maintaining access roads to allow access to structures on an as-needed basis, and managing vegetation for safe operation.

Given the current poor condition of the transmission line, the No Action Alternative would likely cause more frequent and more disruptive maintenance activities than have been required in the past. It might be possible to plan some repairs, but many would likely occur on an emergency basis as the transmission line continues to deteriorate.

The overall scale and scope of the repairs under the No Action Alternative would be smaller than what is planned under the Proposed Action. The maintenance program addresses immediate needs to keep the transmission line functioning and would likely not include more comprehensive improvements such as access road work to improve water runoff, fish-passable culvert replacements, or conductor replacement. Access road work under the No Action Alternative would be limited to enhancements necessary to allow access to specific structures for as-needed repairs and maintenance.

SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION

To determine whether the Proposed Action has the potential to cause significant environmental effects, BPA analyzed the potential impacts of the proposal on human and natural resources and presented them in Chapter 3 of the Final EA. The potential impacts associated with the Proposed Action are summarized below. The Proposed Action, with implementation of selected mitigation measures, would have no significant impacts. The following discussion provides a summary of the Proposed Action's potential impacts and the reasons these impacts would not be significant.

Soils and Geologic Hazards
Impacts to geology and soils from the Proposed Action would be **low**.

- Short- and long-term adverse impacts to soils due to construction would not be significant because compacted and excavated soils, for the most part, would return to their pre-construction productivity and function following completion of construction activities. Additionally, erosion-control devices and water control structures would be installed, weed-free gravel would be applied to roadways, and disturbed areas would be revegetated to minimize soil erosion.
- Soil contamination from wood pole preservatives or accidental spills could occur from the Project but would be greatly minimized from the use of pole wraps and onsite spill containment measures.
- The project area is in a seismically active region and access roads and structures located within active landslide areas and steep terrain could increase the risk of landslides. Geotechnical BMPs would be implemented to minimize the potential risks in areas located within high landslide risk areas.

Vegetation
Impacts to vegetation from the Proposed Action would be **low to moderate**.

- Project construction activities would require clearing and crushing of vegetation. Project construction activities would temporarily disturb approximately 110 acres and permanently remove approximately 4.5 acres of vegetation. Most construction would occur near existing roads and in previously disturbed sites where vegetation would be allowed to regrow. Reestablishing native vegetation in disturbed areas, following construction, would greatly reduce impacts resulting from the Project.
- Approximately 761 danger trees would be cut within and adjacent to the transmission line ROW. Nearly all tree removal would involve removal of single trees rather than groups of trees and would be distributed along the length of the project area. All areas disturbed by tree clearing would be reseeded following construction and trees and shrubs would be allowed to regrow in cut areas located off the ROW. BPA would use a native seed mix of species typical of the area.
- There is low potential for a special-status plants to be impacted by the Project because either suitable habitat is lacking or identified populations would be avoided. There is a documented occurrence of Nelson's checkermallow, a state-listed threatened plant species, near Structure 2/2 on the Allston-Driscoll line. Pre-construction surveys would be conducted and if present, exclusionary zones would be established to ensure that the plant is not removed during construction.
- Construction activities would increase the potential for the spread of invasive plants. Measures would be implemented to minimize noxious weed spread, including inspection of vehicles before entering construction areas, remaining on established roads as much as possible,

installation and use of weed wash stations or use of other appropriate equipment cleaning measures, and using weed-free gravel.

Water Resources, Floodplains, and Fish
Impacts to water resources, floodplains, and fish from the Proposed Action would be **low.**

- Impacts on groundwater quality during construction and over the long term could occur from the accidental release of hazardous chemicals used during construction (e.g., fuels, lubricants, solvents), the removal of existing creosote-treated wood poles and creosote-contaminated soil excavated from existing structure holes, and the leaching of pentachlorophenol (PCP) from new PCP-treated wood poles into groundwater. Mitigation measures would be used to minimize the spread of PCPs and petroleum products, including proper handling and disposal of creosote-treated wood poles and creosote-contaminated soils; spill prevention, containment, and cleanup; wood-pole storage methods; and pole wraps.
- No new impacts on floodplains would occur as the transmission line ROW is already cleared in work locations within the 100-year floodplain and there would be no change to the floodplain's current ability to store and retain water.
- Construction activities occurring in streams would be minimal and BMPs would be put in place to minimize riparian vegetation disturbance, and erosion and sediment control measures would minimize temporary impacts from construction activities by containing overland flow and preventing sediment from entering waterways and fish habitat.
- Temporary impacts on fish, including Endangered Species Act (ESA)-listed salmon could occur during construction; however, all work at stream crossing structures would occur within approved in-water-work windows to avoid periods in which fish are likely to be present. Site isolation, dewatering, and diversion of flows would be required to minimize the downstream transport of turbid water if there is flowing water present at the time of construction.
- Increases in stream water temperatures could temporarily result from shrubby vegetation removal within the work footprints, although no trees would be removed from riparian areas. Vegetation, including shrubby species, is expected to regrow quickly because the areas of vegetation disturbance in riparian areas would be reseeded with a mixture of native shrubs and forbs.
- Construction of a new fish passage bridge would result in 0.02 acre of permanent stream impacts from removal of soil and rock; however, the new bridge would result in beneficial impacts to fish passage in the long term.
- New and replacement culverts in fish-bearing streams, designed and installed in accordance with National Marine Fisheries Service and Oregon Department of Fish and Wildlife fish passage requirements, would not permanently remove or degrade fish habitat, and would ultimately improve habitat and reduce the potential for erosion and sedimentation in the long term.

Wetlands
Impacts to wetlands from the Proposed Action would be **low**.

- The Project could result in minor negative impacts on wetlands by adding fill materials where project activities would occur within or adjacent to wetland boundaries, disturbing vegetation and water conveyance through equipment use in wetlands, or if the Project changes drainage and wetland hydrology. Impacts on wetlands could reduce wetland functions such as filtering pollutants, providing habitat, and water conveyance abilities. Three line structures located in wetlands and 11 others within 100 feet of wetlands would be replaced. There would be 0.01 acre of permanent wetland fill from structure replacement activities. Impact minimization

measures such as the use of wetland matting, revegetation, and workspace minimization would be implemented, and permanent wetland impacts would be mitigated using in-lieu fee mitigation.

- Seventeen wetlands would be temporarily impacted by culvert replacements and installation resulting in 0.02 acre of permanent impacts. Bridge construction would result in 0.02 acre of permanent wetland impacts from removal of soil and rock. Two wetlands would be permanently filled by road reconstruction and road improvement activities and would result in a total of 0.04 acre of permanent impacts. The Project would minimize impacts to the adjacent wetlands by requiring road, culvert, and bridge designs that anticipate and accommodate the movement of water, sediment, and debris during infrequent but major storms and reduce stormwater runoff.
- Pole wraps and corrugated metal pipes would be used on structures located within 50 feet of a wetland, stream, or floodplain to limit contamination from wood-pole preservatives.
- Approximately 10 danger trees would be removed within 50 feet of wetlands, although none would be removed within a wetland. Danger trees would be felled away from wetlands and would not remove or degrade wetlands.

Wildlife

Impacts to wildlife from the Proposed Action would be **low**.

- Most of the wildlife species identified in the project area are highly mobile and would avoid temporary construction disturbance. Habitat changes would be minimal compared to the current land uses in the habitat adjacent to the transmission ROW and access roads.
- Impacts on wildlife from noise and construction activities would vary depending on the proximity to wildlife and the duration of the noise and activity. During the ESA-listed marbled murrelet nesting season (April 1 to September 23), all construction activities within the vicinity of suitable and occupied habitat would adhere to timing restrictions. No helicopter use would be permitted during the marbled murrelet critical breeding period (April 1 to August 5). ESA-listed Columbian white-tailed deer could be impacted by helicopter noise. Helicopter use would be avoided during the Columbia white-tailed fawning period (June 1 to July 15), and helicopter use outside the fawning period would be conducted at standard regulated altitudes.
- Impacts on important wildlife habitats such as wetlands and riparian corridors are largely avoided by the Project.
- Degradation of wildlife habitat would occur temporarily where vegetation is removed and if invasive plants establish themselves in areas disturbed by construction activities. Non-native plants provide poor forage for grazing animals, and impenetrable thickets of weed species can impede wildlife movement. Areas of vegetation disturbance would be recontoured to preconstruction conditions and revegetated using an appropriate native seed mix. Impacts from vegetation clearing/disturbance and access road work could cause incidental injury or mortality to wildlife or temporarily displace them from habitat areas but would be short in duration.
- Danger tree removal could affect common wildlife species and marbled murrelet. Removal of danger trees would occur along the edges of existing cleared areas within and adjacent to the Project ROW and would not measurably impact the adjacent marbled murrelet habitat. No marbled murrelet nest trees would be removed. Danger tree removal would not occur between February 1 and September 23 to minimize displacement of nesting birds (including the marbled murrelet) and to avoid injuring bats.
- Bird collisions could occur at high bird use areas along the line. Bird diverters and perch deterrents would be used along the transmission lines to decrease bird impacts following rebuilding of the transmission lines.

- Pre-construction nest surveys would be conducted to identify active bald eagle nests, bird nests on structures that are planned for replacement, and in the vicinity of where work would occur. If nests are found, avoidance and mitigation measures would be implemented to minimize impacts.
- No adverse effects are anticipated on other ESA-listed species such as northern spotted owl, streaked horned lark, or yellow-billed cuckoo.

Cultural Resources
Impacts to cultural resources from the Proposed Action would be **none to low**.

- Replacement structures would be the same type, and the transmission line would retain its current alignment; the line's visual uniformity would remain, and its integrity would remain intact. There also would be no adverse effect on above ground historic properties in the project's Area of Potential Effect (APE).
- No known archaeological resources occur within the APE for the Project; therefore, the Project would not affect any historic properties of an archaeological nature.
- Unknown cultural resources could be inadvertently discovered during construction and adherence to BPA's Inadvertent Discovery Procedure would ensure that any previously undiscovered resources found would be managed properly to minimize disturbance or destruction.

Transportation
Impacts to transportation from the Proposed Action would be **low**.

- During construction there would be a temporary increase in traffic on nearby roads from construction vehicles, which would cause short-term traffic delays along nearby city and county roads, state highways, and transmission line access roads. Traffic-control flaggers and warning signs of construction activities and merging traffic would be established to limit traffic interruptions.
- Landowners may experience disruptions to daily activities from construction and delivery vehicles driving and parking on private roads serving as access roads. The proposed schedule of construction activities would be distributed to all potentially affected landowners and businesses and posted in recreation areas along the ROW. Access to residences and local businesses during construction would be maintained. Coordination would occur with landowners regarding locations of new or temporary access routes to limit access and traffic disruptions.
- Road construction activities and transmission line crossings of US-30, HWY-202 and HWY-47 would be coordinated with Oregon Department of Transportation.

Public Health and Safety
Impacts to public health and safety from the Proposed Action would be **low**.

- The transmission lines are in close proximity to multiple residences and businesses. The transmission line rebuild would have temporary and minor impacts to public health and safety during construction, including risk of injury to individuals or property damage. Risks to public health and safety would be mitigated through implementation of a Public Safety Plan, including public notification following standard industry practices.

- Safety signage would be established in and around the work areas and safety personnel would be present during construction to ensure non-construction individuals do not access the work sites during construction activities.
- BPA would dispose of used treated wood poles, use clean fill materials, and dispose of debris materials in line with all environmental regulations. BPA would implement appropriate BMPs and mitigation measures, such as disposing materials at an appropriate waste, recycling, or salvage facility.

DETERMINATION

Based on the information in the EA, as summarized here, BPA determines that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA (42 USC 4321 *et seq*.). Therefore, an EIS will not be prepared, and BPA is issuing this FONSI for the Proposed Action.

Finally, consistent with Department of Energy's regulations in 10 Code of Federal Regulations (CFR) § 1022 *et seq*. (Compliance with Floodplain and Wetland Environmental Review Requirements), the Proposed Action would not result in significant impacts to any wetlands as referenced above and presented in Chapter 3 of the EA. Consistent with 10 CFR § 1022.12 and 1022.13, all impacts to floodplains from the Project have been assessed and proper notification provided. As discussed in 10 CFR § 1022.14, Chapter 2 of the Allston to Astoria Rebuild Project Final EA includes a description of the Project Action; the alternatives; and proposed mitigation measures to avoid and mitigate any potential impacts from these actions.

Issued in Portland, Oregon.

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Date