

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: PGE poles and load interconnection at Keeler Substation

Project No.: LURR 20210279 and L0452

Project Manager: Darin Smith – TERR-Chemawa; Matthew Joerin – TEPP-TPP-1

Location: Washington County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.11 Electric power substations and interconnection facilities; B4.12 Construction of electric powerlines approximately 10 miles in length or less; B4.9 Multiple use of powerline rights-of-way

Description of the Proposed Action: The Bonneville Power Administration (BPA) is proposing to allow Portland General Electric (PGE) to build a portion of their new Horizon-Keeler 230-kV transmission line on BPA's fee-owned Keeler Substation property and terminate the new line inside the substation yard.

PGE would construct five new tubular steel monopole structures with drilled pier foundations on the south and east side of the substation property outside the substation yard fence. The new PGE line would then terminate inside the 230-kV substation yard in Bay 11. In order to make room for the new line, the existing PGE Keeler-St. Mary's structure 8/3 would need to move approximately 118 feet to the northwest just beyond BPA fee-owned property and then re-terminate inside the 230-kV substation yard in Bay 9.

Existing roads and native pathways on substation property would be used for construction and future line maintenance. No new roads would be constructed. Trees and brush along the south and east sides of the substation property would need to be removed for the safe construction and operation of the new line, and for future secure line-of-site from the substation entry road and the control house. Counterpoise would not be needed as the structures would use the foundation rebar and ground rods for this purpose. Pulling and reeling sites would be needed to string the conductor. Total temporary disturbance over two construction seasons for all activities would be about 3.6 acres on BPA fee-owned property. Permanent disturbance from the new structures would be about 800 sq. feet. BPA would issue a Land Use Agreement to PGE to construct, operate, and maintain the new line.

To terminate the new line, BPA and PGE would need to complete work in existing Bays 7, 8, 9, and 11. A new 230-kV power circuit breaker, three 230-kV disconnect switches, surge arrestors, and metering transformers would be constructed in Bay 9. Two 230-kV disconnect switches and the existing power circuit breaker would be replaced in Bay 7. The existing Keeler-St. Mary's line would be relocated from Bay 11 to Bay 9 and the new Horizon-Keeler line would then be terminated in vacated Bay 11. New line relays would be installed in Bays 7, 8, 9, and 11. Two static masts and three sections of static wire would be removed on the north side of the existing yard to accommodate the new Horizon-Keeler line. Any concrete footings from replaced

equipment would be abandoned in place. Because of the mast removal, new static lines would be installed on PGE's Keeler-St. Mary's and the new Horizon-Keeler line. Fuse panels, communication equipment, circuits, and racks would be added inside the existing communication building. A GPS antenna would also be mounted on the building and attached to equipment inside the building.

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, Jul. 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/ Nancy A. Wittpenn

Nancy A. Wittpenn
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachments: 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: PGE poles and load interconnection at Keeler Substation

Project Site Description

Keeler Substation is located in Hillsboro, Oregon (T15S, R13E, Section 18) adjacent to and south of Highway 26 and just east of Cornelius Pass Rd. The greater surrounding area is highly disturbed with industrial and residential development that includes Highway 26 and other major arterial roads. Most of these areas are managed landscapes that contain typical native and invasive Willamette Valley vegetation. The closest water bodies to the substation are Dawson Creek (located about 500 yards to the west of the substation) and Rock Creek (located about 700 yards to the east of the substation), both are separated from the substation by dense industrial development. The substation property has been extensively disturbed by construction of the substation and numerous existing transmission lines that criss-cross the area both on BPA's fee-owned land and the land surrounding the substation. The property is mostly flat and contains several delineated wetlands. Stormwater is collected by a drainage system (pipes and catch basins) in the substation and released into perimeter ditches which flow to on-site sedimentation and oil-water separator vaults. The water is then discharged on the east side of the substation property under a stormwater agreement with the City of Hillsboro who holds the NPDES permit from Clean Water Services in Washington County.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: A BPA historian and archaeologist reviewed the area of potential affect and previous cultural resource surveys conducted at Keeler Substation. On January 19, 2023, they determined that the proposed activities did not have the potential to cause effects on historic properties, assuming such historic properties were present.

Notes:

- Treat potential discoveries of archaeological material with BPA's Inadvertent Discovery Plan guidelines attached to the Land Use Agreement: stop work, contact BPA for further required notifications, and ensure integrity of the site and materials until further instructions are given.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Soils would be disturbed during construction by drilled pier foundation placement, steel pole staging at each pole location, pulling and reeling activities, temporary travel on existing pathways, and tree and brush removal. Disturbed soils would be stabilized in accordance with BMPs outlined in the Erosion Control and Sedimentation Plan (ECSP), an Oregon Stormwater Pollution Prevention Plan (SWPPP) equivalent, which was developed

by PGE and reviewed by BPA. Excavated material would be directly loaded onto dump trucks to be disposed of at an approved disposal site, preferably the Hillsboro Landfill.

Notes:

- Implement the PGE developed and BPA reviewed ECSP.
- Post-construction, disturbed areas would be re-graded to original conditions and hydroseeded with a native upland native seed mix that also supports pollinators.
- Chipped material from tree and brush removal would be collected and spread in the southwest portion of the substation property to provide a more stable surface for work areas and to control blackberry growth.
- Spill containment and cleanup materials shall be readily available in construction equipment, staging areas, and at the work sites.

3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No with Conditions

Explanation: Trees and brush would be permanently removed for the construction and safe operation of the new line. Residential and industrial development that surrounds Keeler Substation contains the same mix of native and non-native vegetation and removing these species at the substation would not cause a significant impact to the viability of these species in the landscape or the wildlife that may use them. Existing native and non-native grasses and forbs would be crushed and/or removed during construction in designated tower disturbance areas, at pulling/reeling sites, and in existing pathways. No special-status species or habitats were observed or are known to be present in or near the project site.

Notes:

- Post-construction, disturbed areas would be re-graded to original conditions and hydroseeded with a native upland native seed mix that also supports pollinators.
- Chipped material from tree and brush removal would be collected and spread in the southwest portion of the substation property to provide a more stable surface for work areas and to control blackberry growth.
- Logs from tree removal activities would be transported off-site to reduce fuel loading.

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

Potential for Significance: No with Conditions

Explanation: Wildlife that forage in or around the open areas of the substation property may temporarily scatter from construction noise and activity. Even though noise and activity would temporarily increase because of construction, the substation and surrounding land uses, and a major highway and arterial roads already create an ambient noise level that urban wildlife are likely accustomed to. No special-status species or habitats were observed or are known to be present in or near the project site.

Notes:

- Trees and brush would be removed in August 2023 after the nesting period and during the dry season.

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

Potential for Significance: No with Conditions

Explanation: Dawson Creek and Rock Creek are about 500 and 700 yards, respectively, from the substation in opposite directions. The substation has a stormwater system in place that provides on-site treatment of run-off before being released off-site and the ECSP would be implemented to stabilize soils and control erosion during and after construction. No sediment or project-related runoff is anticipated to reach the waterbodies.

Notes:

- Implement the PGE developed and BPA reviewed ECSP.
- Avoid BPA stormwater system features in the field.

6. Wetlands

Potential for Significance: No with Conditions

- Explanation: Wetlands were delineated at the substation on July 1 and 28, 2022, and consist of isolated depressional palustrine emergent and palustrine scrub-shrub wetlands in and adjacent to mowed fields. While these isolated wetlands are non-jurisdictional features to the US Army Corp of Engineers (COE), they are jurisdictional to the Oregon Department of State Lands (DSL). The wetland report was sent to the COE and DSL. Work during August 2023 would be done during the dry season to avoid any impact to wetlands. In addition, oak mats would be used to cross vegetative corridors that function as wetland buffers and wetlands would be fenced for avoidance during line construction.

Notes:

- Complete work during dry season to avoid any wetland impacts.
- Use oak mats to cross vegetative wetland buffers.
- Fence delineated wetlands for avoidance.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The 5 drilled pier foundations would not interfere with the movement of potential groundwater in the area. No known aquifers exist at this location.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Utilities are an accepted land use at this location. There are no specially-designated areas at this location.

9. Visual Quality

Potential for Significance: No

Explanation: Several high voltage transmission lines cross the Keeler Substation property. An additional transmission line at the Keeler Substation property would not be out of character and visually consistent with the many transmission lines and towers on-site.

10. Air Quality

Potential for Significance: No

Explanation: Temporary dust and vehicle emissions would be generated during construction.

11. Noise

Potential for Significance: No with Conditions

Explanation: Construction noise would be temporary and would occur during daylight hours. PGE would coordinate noise disturbance with surrounding landowners to maintain acceptable levels.

Notes:

- PGE would notify surrounding landowners of the construction schedule.

12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: Line construction at the edges of BPA property would temporarily affect motorists using Cornelius Pass Rd. and Highway 26. Line construction could also temporarily affect substation staff.

Notes:

- PGE would coordinate construction timing and safety requirements with BPA while working at Keeler Substation. Open construction holes would be covered overnight. Tree stumps would be cut at ground level to avoid safety hazards to maintenance machinery and staff.
- Construction contractors would provide flaggers and road closures as required by state, county, and city authorities to assure safety for motorists on Cornelius Pass Rd. and Highway 26.
- A Pollution Abatement Clearance would be completed for disturbed yard material needing disposal off-site.

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: N/A

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation: N/A

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: N/A

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: N/A

Landowner Notification, Involvement, or Coordination

Description: PGE would notify surrounding landowners within 250 feet of the project by letter before construction. A project website would also be available to the public.

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

Signed: /s/ Nancy A. Wittpenn March 13, 2023
Nancy A. Wittpenn, ECT-4 Date
Environmental Protection Specialist