# **Categorical Exclusion Determination**

Bonneville Power Administration Department of Energy



Proposed Action: Ridgefield Pits Restoration Project

Project No.: LURR 2023-0153

Project Manager: Billie Woodman - TERR-ROSS MHQA

Location: Clark County, WA

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021)</u>: B4.9 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Lower Columbia Estuary Partnership (LCEP) to use BPA's fee-owned right-of-way (ROW) and access road between BPA structures 12/2 through 12/5 along the Ross-Lexington-1 transmission line in Clark County, Washington. LCEP would use the fee-owned ROW for staging and access, fill an existing gravel pit, and remove a grass berm. The work on BPA fee-owned land would be part of LCEP's Ridgefield Pits Restoration Project that would reconfigure the East Fork Lewis River (EFLR), restore the channel bed located east and adjacent to BPA's ROW, and permanently fill six of nine abandoned water-filled gravel pits.

To support LCEP's action, BPA is proposing to allow its ROW as an access point and temporary equipment and material staging area for LCEP's Ridgefield Pits Restoration Project. LCEP's restoration efforts within BPA's ROW would also include permanently filling a small section of the abandoned water-filled gravel pit located approximately 185 feet North of structure 12/4. Water from the abandoned water-filled gravel pit on BPA's ROW would be pumped into the EFLR or onto the surrounding Clark County Park property outside of BPA's ROW. LCEP would also remove a small elevated above-grade vegetated soil berm (approximately 3 foot tall by 8 feet wide by 150 feet long [approximately 140 cubic yards]) located approximately 50 feet south from structure 12/4. Soil removed from the vegetated berm within the ROW would be used to fill the abandoned gravel pits or disposed of at a federally and state approved processing facility. These two restoration areas are both located on the eastern side of BPA's ROW. All work areas would be restored and revegetated upon project completion.

Project construction, staging of materials, and use of equipment along BPA's ROW would possibly include but not be limited to, large woody debris, dump trucks, excavators, bucket loader, pick-up trucks, and motor operated and power hand tools.

All proposed construction work and restoration would be conducted by LCEP would be in accordance with an Environmental Assessment, Clean Water Act permits, and mitigation measures overseen by the US Army Corp of Engineers.

**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.

Sylas Daughtrey Environmental Protection Specialist

Concur:

Katey C. Grange NEPA Compliance Officer

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.

### Proposed Action: Ridgefield Pits Restoration Project

# **Project Site Description**

The proposed project site is located in Clark County, Washington Township 4 North, Range 1 East, and Sections 13 and 24. The surrounding area and land use consists of non-recreational Clark County Park land, the East Fork Lewis River (170 feet east of BPA's ROW at its shortest distance) and surrounding flood plain, small agricultural land parcels, the Ridgefield gravel processing pits, and large residential land parcels. The general area surrounding and within the project area contains multiple delineated wetlands and the EFLR floodplain. The area consists of low-growing native and non-native grasses and shrubs.

# **Evaluation of Potential Impacts to Environmental Resources**

#### 1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The proposed work does not include any ground-disturbing activities that would affect cultural or historic resources. BPA cultural resource review has stated the area of proposed construction has seen substantial disturbance and it is highly unlikely archaeological resources would be identified. In the event any archaeological material is encountered during construction, the environmental lead will immediately be notified and work halted in the vicinity of the finds until they can be inspected and assessed.

BPA consulted with the Washington Department of Archaeology and Historic Preservation (DAHP), Cowlitz Indian Tribe, and Confederated Tribes of Grand Ronde regarding the project on September 16, 2024. In its letter, BPA summarized previous cultural resources investigations that overlapped the Area of Potential Effects (APE); no archaeological resources were identified and the project area has been substantially disturbed such that there is a low probability for these types of resources. As part of its consultation letter, BPA determined that the project would have no adverse effect on historic properties. DAHP provided a letter of concurrence dated September 23, 2024. No additional responses were received within 30 days.

#### 2. Geology and Soils

Potential for Significance: No

Explanation: Impacts to soils are anticipated on BPA's ROW due to heavy machinery traffic and access to the project site, staging of materials, and the removal of approximately 140 cubic yards of vegetated soil at the removed berm site. The area of ground-disturbing activities would take place in and around previously-disturbed areas. These previously-disturbed areas include graveled, tilled, and/or compacted soils. The project site area is located on and/or near heavily disturbed industrial gravel pits and previous agricultural land. Best Management Practices (BMPs) such as erosion wattles and silt fencing would be

implemented during construction and following construction. Temporarily disturbed soils would stabilize as native plant seeding and vegetation is reestablished following completion of construction.

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

Potential for Significance: No

Explanation: There are no documented occurrences of any special-status plant species, including plants listed under the Federal Endangered Species Act (ESA), near the project site, and no suitable special-status species habitat would be permanently impacted. Invasive plants identified in the work areas would be removed. Also, vegetation would be crushed and excavated by project activities, but areas of disturbance would be re-seeded with a native seed mix for revegetation.

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

Potential for Significance: No

Explanation: The proposed staging area, filling of the abandoned gravel pit, and the removal of the vegetated soil berm would be in established BPA property and is expected to occur during daytime hours. The minor and temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during construction; however, there would be no permanent impacts to wildlife habitat, and temporarily disturbed or displaced wildlife species that could be present in the area would likely be habituated to this level of disturbance given surrounding land uses. There are no listed or special-status wildlife species present within the project area.

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

Potential for Significance: No

Explanation: The proposed project staging area on BPA's ROW runs approximately 0.5 miles perpendicular and approximately 100 feet to 200 feet west of the main stem East Fork Lewis River and is located adjacent and within the East Fork Lewis River's natural floodplain. The East Fork Lewis River eventually crosses through BPA's ROW between structures 12/5 and 12/6 of the Ross-Lexington No.1 transmission line. In-water work (filling the gravel pit) would be implemented and conducted by LCEP under the Clean Water Act (CWA) permit issued (NWS-2023-662) for the permanent filling of the abandoned waterfilled gravel pit that borders and crosses slightly into BPA's ROW near structure 12/4. Any water pumped from the abandoned gravel pit would be discharged into the EFLR or surrounding Clark County Park land or floodplain outside of BPA's ROW. Erosion controls such as silt fencing or wattles would be implemented for BMPs to prevent sediment from migrating off the disturbance areas into nearby waterbodies.

#### 6. Wetlands

Potential for Significance: No

Explanation: There are no delineated wetlands that would be impacted on BPA fee-owned property with the exception of the abandoned gravel pit that would be filled. BMPs would include erosion control wattles and silt fencing to ensure localized soil disturbance does not cause sedimentation issues within surrounding wetlands. LCEP has obtained a Section 404 CWA permit (NWS-2023-662) and 401 Certificate for temporary impacts during construction including the permanent filling of the abandoned gravel pits. LCEP would implement all

mitigation measures stipulated under the permit authorization. The filled gravel pit on BPA fee-owned land would be seeded with a site-specific wetland seed mix after construction.

#### 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed removal of the soil berm would be limited and only involve soils above the surrounding ground level. The water-filled gravel pit construction work within BPA's ROW would have minimal impacts to the surrounding groundwater supply as spill prevention measures would be utilized during construction activities to reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater or aquifers. The project would have no permanent impact on groundwater or aquifers.

#### 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: There would be no change in land use and specially-designated areas as a result of LCEP's proposed work on BPA fee-owned land The proposed berm removal along with current and future access to BPA's ROW would not be affected for future land use. Future or more frequent water inundation from the East Fork Lewis River is not expected as a result from the overall LCEP restoration project. Because this is not a publicly accessible Clark County Park area the proposed impacts on the surrounding park lands would not affect any land use or specially-designated areas.

#### 9. Visual Quality

Potential for Significance: No

Explanation: Visual changes would be limited to the project area and surrounding environment due to the overall restoration project. No visual changes within BPA's ROW would be expected. Disturbed areas would be stabilized and returned to previous visual conditions.

#### 10. Air Quality

Potential for Significance: No

Explanation: No impacts to air quality are anticipated as a result of the project.

#### 11. Noise

Potential for Significance: No

Explanation: Temporary construction noise would occur during daylight hours. No ongoing noise increase is expected for this area as a result of this project.

#### 12. Human Health and Safety

Potential for Significance: No

Explanation: No impacts to human health and safety are anticipated from the result of this project.

## **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

<u>Description</u>: LCEP is responsible for contacting, coordinating, and working with affiliated landowners which include Clark County Parks and surrounding landowners.

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

Signed:

Sylas Daughtrey Environmental Protection Specialist