Proposed Action: Franklin-Schultz Fiber Optic Replacement Project

PP&A No.: 2066

Project Manager: Glenn Vanbergen - TEP-TPP-1

Location: Franklin, Benton, Yakima, and Kittitas counties, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.6 Additions and modifications to transmission facilities; B4.7 Fiber optic cable

Description of the Proposed Action: BPA is proposing to replace the aerial fiber optic cable between BPA’s Franklin and Schultz Substations, a total of 110 line miles. The work would be a part of BPA’s ongoing operation and maintenance of its existing communication systems. Table 1 identifies Township, Range, Section Number, County, and State information.

BPA proposes to replace the existing overhead dispersion 36-count fiber optic cable with a non-dispersion shifted 72-count fiber optic cable, to improve BPA’s transmission system and communication needs. The new cable has the same color and finish of the current fiber optic cable, but would be 0.09 inches larger in diameter.

Twelve new fiber optic wood poles (FOWPs) with anchors and nine new concrete vaults would be installed, primarily at existing pole and structure sites. Fiber optic wood poles that carry the fiber optic cable would range from between 50 and 70 feet in height. New pole holes would range between 7 and 9 feet deep, depending on subsurface conditions. Vaults typically would be 4-foot-by-4-foot-square concrete enclosures that would be either placed on the ground or partially imbedded.

At eight existing FOWP sites, the guy-wires would be replaced and the existing plate anchors would be reused. Four existing FOWP structures would need to be rebuilt and include the addition of new plate anchors or reuse of the existing plate anchors. Many of the existing wood pole structures on this project would require strengthening by the addition of cross bracing which is a non-ground disturbing activity. To prevent uplift due to the additional weight of the new fiber cable, at Midway-Benton-2 Structure 27/4, up to 1 cubic yard of rock would be mound at two of the outer legs of the structure. Seven existing FOWPs would be removed and fiber optic cable transferred to the adjacent Lower Monumental-Ashe-1 steel lattice structures.

This project would bury two short runs of fiber optic cable at Benton and Franklin Substations totaling approximately 160 feet. These runs would be used to bring fiber optic cable into and out of vaults connecting to the substations and relieve aerial congestion in high traffic corridors. A 5-mile-long section of fiber optic cable along the Ellensburg-Moxie No. 1 transmission line (in the Wenas Wildlife Area) would be buried due to repeated vandalism. Burial of fiber optic cable would be by excavator, drop plow, or directional boring, depending on location along the route.
Depending on installation method, trench ground disturbance would range from none for directional boring installation up to about 48 inches in locations using an excavator. The buried cable would be placed at a depth of about 4 feet. Additional imbedded vaults would be needed to pull in fiber optic cable along the 5-mile-long segment.

Forty-six temporary pulling/tension (P/T) sites would be needed to remove and install the fiber optic cables. P/T sites would be an average of 50 to 75 feet wide by approximately 100 to 150 feet long to accommodate placement of fiber optic cable spool and tensioner trailer. In sensitive areas P/T sites can be setup on adjacent roads and pulling equipment can be leveled using wood lagging, or setup on wood/composite construction mats. Where no apparent AOL or BOL sites exist on existing access roads or 2-track roads, vegetation may need to be cut or crushed for access to and setup of sites.

Existing fiber optic cable removed may be lowered to the ground and collected on reels, or reeled out of the supporting structures under tension on a system of wheeled travelers staying above the ground. New fiber optic cables may be strung through travelers in structures using helicopters, by vehicles on the ground, or by hand where necessary. Aerial guard structures would be utilized on this project to protect railroad and highway crossings. No permanent new access roads would be needed for this project, however, two temporary overland access routes would be needed to install two of the new FOWPs totaling 165 feet in length. Some minor road improvements on existing roads, such as adding rock and shaping roads may be needed. In total, up to about 29.4 acres of temporary soil disturbance over the 110-mile-long project area could be disturbed. No tree clearing or in-water work would be necessary.

The project would be split into two construction phases. Under Phase 1, installation work between Franklin and Wautoma Substations would occur from fall 2022 through spring 2023, and occur between Moxee and Schultz Substations in spring 2023. The five-mile-long section of fiber conduit burial on the Wenass Wildlife Area would occur in fall 2022. During Phase 2 removal work between Franklin and Wautoma Substations would occur between fall 2023 and spring 2024, and between Moxee and Schultz Substations in spring 2024.

Table 1. Township, Range, Section Number, County, and State information

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**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/ Kevin George  
Kevin George  
Environmental Protection Specialist

Concur:

/s/ Katey Grange  
Katey C. Grange  
Date: September 29, 2021  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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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:** Franklin-Schultz Fiber Optic Cable Replacement

**Project Site Description**

The project traverses a combination of privately-owned or publically-managed lands. Public lands are managed by: Dept. of Energy (DOE) Hanford Site and Hanford Reach National Monument McGee Ranch/Riverlands Unit (Hanford Unit), BPA, Dept. of Defense (DOD) Yakima Training Center, US Fish and Wildlife Service (USFWS) including Hanford Reach National Monument (Fitzner/Eberhardt Arid Lands Ecology Reserve [Rattlesnake Unit]), US Bureau of Reclamation (USBR), Washington Department of Natural Resources (WDNR), and Washington Department of Fish and Wildlife (WDFW) including Wenatchee River Area and Mattoon Lake.

Land uses in the area include agricultural, wildlife land management, military, industrial, graveled substation yards, and rural residential and public parks. Landforms crossed include shrub steppe, scrub shrub, inter-mountain basins active and stabilized dunes, agricultural and range land. The project transmission line corridor crosses the Columbia River, Yakima River, Umtanum Creek and Mercer creek. Wetlands in the project area were identified using the USFWS National Wetland Inventory (NWI). Areas identified in or adjacent to USFWS National Wetland Inventory (NWI), mapped wetlands are located adjacent to: Benton-Franklin No. 2 Strs. 1/2 (Columbia River), 9/1, 9/3, Ellensburg-Moxee No. 1 Strs. 3/6, 3/9 and 3/10 (Yakima River), 23/2 (Mattoon Lake), and Columbia-Ellensburg-1 Strs. 30/3, 31/7, 34/4, and 34/7-35/1 (seasonal inundation), 35/10-35/11 (Whiskey Creek).

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**

   Potential for Significance: No

   **Explanation:** BPA conducted consultation under Section 106 of the National Historic Preservation Act (NHPA) with for the entire Ross-Schultz fiber optic replacement project which BPA initiated consultation on July 24, 2014. BPA initiated consultation with the: Confederated Tribes of the Warm Springs Reservation of Oregon (Warm Springs), The Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Tribes and Bands of the Yakama Nation (YN), the Nez Perce Tribe of Idaho (NP), the Wanapum People, the Confederated Tribes of the Colville Reservation (Colville), the Department of Defense (Yakima Training Center), the Department of Energy, Richland, and the Washington State Department of Archaeology and Historic Preservation (DAHP). In the winter of 2020, after determining that there were additional government agencies to consult with, BPA reached out to the U.S. Bureau of Reclamation (BOR), the Washington State Department of Natural Resources, and the Washington State Department of Fish and Wildlife (WDFW) to notify them of the proposed project and obtain any necessary fieldwork clearances.

   The consulting parties were informed of the project and provided an opportunity to provide information on the Project Area of Potential Effects (APE). A cultural resources field survey was conducted within the APE. Three precontact lithic scatters were recorded (sites 45KT04444, 45KT04446, 45YA01830). The survey identified site boundaries; the proposed project activities would
avoid these resources. Additionally, one historic refuse scatter (45KT04445) and two precontact isolated finds (45YA01830 and 45YA01832) were recorded within the APE and BPA recommended them as not eligible for listing in the NRHP as they do not possess the qualities required for listing in the NRHP.

On February 20, 2021 BPA submitted the field survey report to its consulting parties for a 30-day review period and a determination letter stating that the proposed project would have no adverse effect to historic properties. On February 22, 2021, BPA received concurrence on its finding from the DAHP. The DAHP further stated that an Unanticipated Discovery Plan for cultural resources should be followed during construction. BPA also received responses from the BOR, WDFW, Yakama Training Center, the Warm Springs, the CTUIR, the Colville, and the YN stating that they had no concerns. The NP requested that BPA's cultural staff monitor any ground disturbing activities within the Hanford Site. The YN have requested to be notified in advance of monitoring so that they may participate if available.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: The proposed action would temporarily disturb soils for the installation of new FOWPs, rebuilding of fiber optic wood pole structures, guy wire anchor installation, concrete vault installation, burial of fiber optic cable conduits, and at temporary pulling/tension sites not located on roads.

Up to 29.4 acres of temporary soil disturbance over the 110-mile-long project area could occur; approximately 3.1 acres would occur within private cultivated agricultural areas that are routinely disturbed by agricultural activities. The remaining temporary soil disturbances would occur on private uncultivated lands and public lands. Soils that would be disturbed by the proposed action would stabilize as vegetation is reestablished and would eventually return to pre-existing conditions following completion of the project.

The majority of construction work for this project would take place during the eastern Washington regional wet season that for stormwater management purposes begins October 1 and runs through June 30. A project Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented to manage erosion due to stormwater and wind. The SWPPP would address hazardous materials management, erosion control measures, access requirements, stabilization, restoration, and management of work on-site and within sensitive areas.

Notes:

- Avoid spreading augured soils in native plant communities and special-status species habitat (identified as sensitive areas in the MIT and photomaps). Use excavated soils for backfill, or spread evenly no more than 10 feet from the wood-pole bases, or removed from the area for disposal.
- Revegetate disturbed areas on public lands with a native, locally sourced seed mixes developed in coordination with land managers (i.e. DOE Hanford, USFWS, USBR, and WDFW) following completion of construction. On private land, BPA may revegetate with a regionally appropriate native seed mix or agriculturally suitable ground cover seed mix for cultivated areas, or mix approved by the landowner.
- Seed germination would be monitored until site stabilization is achieved, as defined by an appropriate level of cover for this geographic area (i.e., make use of sterile hybrids in seed
mix). If vegetative cover is inadequate, BPA may implement contingency measures and reseed to ensure adequate revegetation of disturbed soils, if required.

- Rosa Creek Road and ROW access roads serving Ellensburg-Moxee Miles 16 and 17 (Wenas Wildlife Area) are degraded and susceptible to damage from heavy vehicle use during the regional wet season. Utilize specialized low ground pressure vehicles (ATV’s), track matting, and alternate approach routes.
- ROW access roads serving Hanford-Wautoma No. 2 Strs. 13/4 through 17/2 are steep, composed of highly friable soils, and are severely degraded. For this project, access along these roads, and to structure sites, would require the use of specialized low ground pressure vehicles (ATV’s), walking, or potentially even using a helicopter.

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

Potential for Significance: No with Conditions

**Explanation:** Vegetation would be disturbed for installation of new FOWPs, rebuilding of fiber optic wood pole structures, guy wire anchor installation, concrete vault installation, burial of fiber optic cable conduits, and at temporary pulling/tension sites not located on roads. The proposed action could temporarily crush, clear, or shade up to 29.4 acres of vegetation. Approximately 3.1 acres would occur within cultivated agricultural areas that lack native vegetation. The remaining temporary disturbances would occur on managed public and private lands. Vegetation would be permanently removed in about 0.02 acres where new poles, guy wires, and concrete vaults are installed.

Plant species protected under the Federal Endangered Species Act (ESA) were not identified as being in the project area. Several sensitive species were identified in discrete locations in the project area. Grand redstem (state threatened [ST]) and lowland toothcup (state sensitive [SS]) have been identified in areas that are seasonally inundated by the Columbia River in mile 1 of Benton-Franklin No. 1. Thompson’s sandwort (SS) and Gray cryptantha (SS) have been identified in close association with WNHP (Critically Imperiled (S1)) Inter-mountain Basins Active and Stabilized Dunes on the Hanford Site Ashe-Hanford No. 1 miles 3-5. Columbia milkvetch (SS) has been identified in the Hanford-Wautoma No. 2 miles 15-17 and mature shrub-steppe habitat WNHP (Vulnerable (S3)) and Wyoming big sagebrush/bluebunch wheatgrass shrubland community, has been identified in the Hanford-Wautoma No. 2 miles 14-15. Further, these state-listed sensitive plant species and the sagebrush-dominated communities on Hanford could be susceptible to direct impacts from construction and compaction from vehicle access. Overall, impacts to these plants and communities would be minimized and avoided in most cases through the use of timing restrictions, reduced work area size, restricting vehicles and personnel to existing roads and identified access routes, landings, flagging large plant populations for avoidance, restoration of disturbed sites, and noxious weed management.

**Notes:**
- See notes in the Geology and Soils section above.
- Avoid known populations of the special-status grand redstem, lowland toothcup, Columbia milkvetch, Thompson’s sandwort, Gray cryptantha, and mature sagebrush and Wyoming big sagebrush communities, (identified as sensitive areas in the MIT and photomaps).
- Ensure the construction contractor installs “Sensitive Area” signage, fencing, and and/or flagging around the know populations of special-status plant species, to restrict vehicles and equipment to designated routes and work areas.
- Begin construction activities on the Hanford Site and Fitzner/Eberhardt Arid Lands Ecology Reserve, on or after October 1 and end mid-February to minimize the effect on native plant seed production, and to minimize the risk of construction-related fire.
• To protect dormant plants and two track roads through sensitive habitats from compaction and damage during the wet season (Ashe-Hanford No. 1 Strs. 1/3 through 5/2 (inland active or stabilized dunes/sandsheets)), and two track roads along Hanford-Wautoma Nos. 1 & 2 between Hanford Substation and HWY 240, low impact structure access methods and low ground pressure vehicles (ATV's) would be utilized.

• When working in dune/sandsheet areas, limit vehicle access to the existing main line access roads.

• To limit ground disturbances in sensitive areas where possible, set up pulling/tensioning sites on existing roads.

• Ensure vehicles and equipment are cleaned prior to the start of construction to minimize the introduction and spread of weeds. Clean vehicles and equipment as soon as possible after completion of the project. If, at any point during construction, vehicles and equipment are temporarily used for work at another project site, then they should be cleaned prior to returning to the project site.

• Use local sources of rock for road maintenance and uplift rock, where possible obtain rock materials from approved noxious weed-free quarries.

• Cut or crush vegetation rather than blading or clearing areas that would be temporarily impacted.

• Treat noxious weeds within ROW work areas, staging areas, and pulling/tensioning sites prior to and post construction.

• Revegetation actions on Hanford National Monument would be performed in accordance with a project Revegetation Plan to be developed by BPA based on the DOE Hanford Site Revegetation Manual (DOE/RL-2011-116). The 5-year post-construction restoration plan would guide monitoring, revegetation, and restoration efforts in areas disturbed during the project.

• Provide Wenatchee Wildlife Area land managers with native seed for restoration and herbicides for treatment in project area.

• Grasses and forbs used for revegetation would be locally sourced and weed free.

• Areas requiring restoration would be re-contoured/shaped prior to stabilization

• Permanent erosion and sediment control materials would be 100% biodegradable and weed free.

• Where additional protective measures are needed for access or for work sites, wooden or plastic wetland mats would be utilized to minimize impacts at sensitive locations.

• Environmental resource specialists would be utilized to identify and monitor sensitive plant species.

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

Potential for Significance: No with Conditions

Explanation: The proposed action could affect wildlife through a small amount of temporary and permanent habitat loss or modification, construction noise, spread of noxious weeds, and increased risk of being struck by construction vehicles. No species protected under the Federal Endangered Species Act (ESA) were identified as being in the project area.

Bald eagles (Haliaeetus leucocephalus) occupy nests and winter roosting sites on the Hanford Site north of Benton Substation and east of Hanford Substation. Additional avian species identified on the Hanford Site include: Ferruginous hawks (Buteo regalis) and Swainson’s hawks (Bueto swainsoni), sagebrush sparrow (Artemisiospiza nevadensis), red-tailed hawk (Buteo jamaicensis), common raven (Corvus corax), and Loggerhead shrikes (Lanius ludovicianus). Greater sage grouse (Centrocercus urophasianus) have been observed in or near Hanford-Wautoma No. 2 miles 12-14 on the USFWS managed Fitzner/Eberhardt Arid Lands Ecology Reserve (Rattlesnake Unit). Construction activities in these areas would take place between October 1 and early February, which is outside of the breeding and nesting season for resident and migratory species in these locations.

Several special-status species identified between BPA’s Moxee and Schultz Substations include avian species: prairie falcon (Falco mexicanus), golden eagle (Aquila chrysaetos), and greater sage grouse (Centrocercus urophasianus) observed in or near Ellensburg-Moxee No. 1
miles 8, 9, and 11 (WA State Lands and Wenas Wildlife Area). Sensitive mammals and habitats located on the Wenas Wildlife Area include: Townsend’s ground squirrel (Urocitellus townsendii) and elk mass congregation and winter-feeding range.

Project activities would be timed to not interfere with avian species feeding for migration, greater sage-grouse lekking, and movement of elk to winter forage rangeland. Disruptive noise from construction equipment would be temporary and helicopter use would be restricted near occupied nests. Vehicles speeds on ROW roads would be restricted to 5 mph in areas inhabited by Townsend’s ground squirrel and vehicle movement restricted to existing roads and work areas, to allow movement of adults and young to evade equipment while feeding. Overall, through the implementation of the minimization measures, the project would have a small, temporary impact to wildlife, including sensitive wildlife, in the project area.

Notes:

- See notes in Plants section above.
- On the Hanford Site, perform and complete work near Bald eagle nesting/winter roosting sites prior to November 15, or December 15 in accordance with timing and buffer restrictions established in the Hanford Eagle Management Plan.
- On the Hanford Site, complete work outside of the access restriction periods (see Table 2).

### Table 2. Hanford Raptor Use Areas

<table>
<thead>
<tr>
<th>Species</th>
<th>Buffer Zone Size (Occupied nest)</th>
<th>Access Restriction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bald Eagle</td>
<td>1 At least 660 ft.</td>
<td>1 November 15-July 31</td>
</tr>
<tr>
<td>Burrowing Owl</td>
<td>0.5 mi. dia.</td>
<td>February 15-Sept. 25</td>
</tr>
<tr>
<td>Swainson’s Hawk</td>
<td>0.5 mi. dia.</td>
<td>March 15-August 15</td>
</tr>
<tr>
<td>Red-tailed Hawk</td>
<td>0.5 mi. dia.</td>
<td>March 1-August 31</td>
</tr>
<tr>
<td>Ferruginous Hawk</td>
<td>0.6 mi. dia.</td>
<td>March 1-August 15</td>
</tr>
</tbody>
</table>

1 Utilize most current Hanford Site Bird Nesting Season guidance document for bald eagle wintering and nesting requirements.
2 Currently no work/access is planned within the 0.6 mi. nesting buffers of Midway-Benton-2 Strs. 21/4, 23/4, and 26/4 however, these areas should be observed as “No Fly” zones.

- Helicopter “No Fly Zone” w/in 1,000 feet of occupied Golden Eagle and prairie falcon nests (Wenas Wildlife Area). No fly zone north of Ellensburg-Moxee No. 1 miles 7-10 beginning March 10 through Sept. 15 for sage-grouse protection.
- In those areas approved for helicopter usage, helicopters would be required to fly a minimum of 330 feet above project work areas, except for when they are working directly in the ROW, where there would be no minimum distance requirement.
- Protect Townsend’s ground-squirrels by limiting the size of work areas near identified colonies. Utilize restrictive markers and barriers to demarcate road and work boundaries, restrict vehicles to existing roads, landings, and work sites, and limit construction speed to 5 mph when w/in 200 feet of an identified colony.
- On the Wenas Wildlife Area, to stay ahead of elk moving to winter rangeland, begin fiber conduit burial work in the north at Ellensburg-Moxee No. 1 Str. 17/1 in mid-September and move south, with a milestone completion date of October 24 at Ellensburg-Moxee No. 1 Str. 20/2, and entirely out of the southern area (Ellensburg-Moxee No. 1 Str. 22/2) by November 1. On the Wenas Wildlife Area wintering elk “No Work” restriction begins November 1 and ends April 1 between Ellensburg-Moxee No. 1 Str. 10/4 (Umtanum Ck.) ahead-on-line to Str. 22/3.
- On the Wenas Wildlife Area disruptive activity is restricted on or within six tenths (0.6) mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6 pm to 9 am from March 10-May 15. Beginning April 1 to May 15, no ground disturbance. Beginning May 16 through Sept. 15 no work. See Table 3.

### Table 3: Sage-grouse Lek Observation and Restricted Areas

<table>
<thead>
<tr>
<th>Lek Observation</th>
<th>Restricted Area Includes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.09 mi east of ELLN-MOXE-1 Str. 8/4</td>
<td>A/R to ELLN-MOXE-1 Str. 7/7 AOL to Str. 8/8</td>
</tr>
</tbody>
</table>
On the USFWS managed Fitzner/Eberhardt Arid Lands Ecology Reserve, disruptive activity is restricted on or within six tenths (0.6) mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6 pm to 9 am from March 1-May 15. Beginning April 1 to May 15, no ground disturbance. Beginning May 16 through Sept. 15 no work see Table 4.

### Table 4: Sage-grouse Lek Observation and Restricted Areas

<table>
<thead>
<tr>
<th>Individual Observation</th>
<th>Restricted Area Includes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.09 mi east of HANF-WAUT-2 Str. 13/3</td>
<td>A/R to HANF-WAUT-2 Str. 12/5 to AOL Str. 14/1</td>
</tr>
</tbody>
</table>

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

**Potential for Significance: No with Conditions**

**Explanation:** Bull trout (Salvelinus confluentus), steelhead trout (Oncorhynchus mykiss), and Chinook salmon (Oncorhynchus tshawytscha), are found in the proposed project area within the Columbia and Yakima Rivers. Additionally sockeye salmon (Oncorhynchus nerka) is found in the Columbia River. The Columbia River is designated critical habitat for all four listed species; the Yakima River is designated critical habitat for steelhead and bull trout. Steelhead trout (Oncorhynchus mykiss) are found in Umtanum and Whisky Creeks, which are listed as critical habitat for these species. However, no construction activities would occur within a water body or floodplain, and stormwater best management practices would prevent indirect impacts to water bodies, floodplains, and special-status fish.

**Notes:**
- See notes in the Geology and Soils sections above.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

### 6. Wetlands

**Potential for Significance: No with Conditions**

**Explanation:** Utility vehicles accessing structure sites within riparian areas and along roads crossing prior converted agricultural lands prone to seasonal inundation have the potential to compact sensitive riparian soils and/or produce turbid runoff. Ground protective access and work measures would be utilized to prevent compaction to riparian soils, and erosion and sediment control best management practices (BMPs) would be implemented to prevent turbid runoff from entering waters of the State. This project would have small de minimis effects on wetlands below 404 permitting thresholds.

**Notes:**
- See notes in the Geology and Soils section above.
- Should access roads to structures or work areas be submerged or unable to support equipment without rutting, construction mats, track matting, using low ground pressure vehicles, and walking to work sites would be utilized to provide access to, and to limit compaction and ground disturbance.
- Wetland boundaries would be flagged in the field for avoidance (identified as sensitive areas in the MIT and photomaps).
- Ground disturbances and compaction at pulling/tensioning sites would be limited by using cribbing to level reel trailers, and/or wood/composite construction mats.
- Where applicable, reduce ground disturbances at guy wire anchor locations by reusing existing buried hardware and/or using helicoil anchors (Ellensburg-Moxee No. 1 Str. 3/9, Columbia-Schultz No. 1 FOWPs 35/1A&B and 34/8A&B).
- Work areas would be restricted to the minimum area needed to work safely.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.
- New poles at wetland sites would be fitted with chemically resistant boots to prevent wood preservative migration.
- Wetland areas impacted by work activities will be restored to pre-construction condition.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: Excavation and/or directional boring activities for this project would not require withdrawals of ground water, utilize materials having the potential to contaminate ground water, nor reach depths to groundwater. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:
- A directional drilling blowout plan would be developed to address loss of pressure during boring operations.
- Directional boring fluids would only consist of sand and water.
- Used boring fluids would be captured and legally disposed of off-site.
- Legally obtained potable water would be used for drilling operations.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

8. Land Use and Specially-Designated Areas,

Potential for Significance: No with Conditions

Explanation: The proposed project takes place on private lands and public lands. Project activities may cause temporary disruption, but would not change the long-term land use, and would maintain consistency with land management plans.

Notes:
- Implement timing, access, and sensitive area work and restoration requirements addressed in Geology, Plants, and Wildlife sections.
- Notify and coordinate access and entry protocols prior to entering. Coordinate helicopter usage and flight paths on the Hanford Site and YTC.
- On the Hanford Site specific hazard and alarm training is required.
- On the Hanford Site, all excavated soils, and removed fiber optic cable and appurtenances, must be radiologically tested and characterized for either on-site or off-site disposal.
- All construction equipment would carry an adequately stocked spill response kit.
- Implement Federal, state, and Hanford Fire Marshal fire prevention requirements.
9. Visual Quality

Potential for Significance: No

Explanation: The new cable has the same color and finish of the current fiber optic cable but would be 0.09 inches larger in diameter. Several new fiber optic woods poles and imbedded concrete vaults would be located adjacent to existing transmission structures in the ROW or near existing substations. Rebuilt wood pole structures, anchors and guy wires, would be similar in appearance, color, and location to the current structures. Along the Lower Monumental-Ashe No. 1 transmission line, FOWPs would be removed and the cable transferred to the adjacent steel lattice structure. These changes would be consistent with the existing visual quality of the area.

10. Air Quality

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and vehicle emissions in the local area from general construction activities. There would be no long-term change in air quality following completion of the proposed action.

Notes:
- Implement dust suppression measures as identified in the MIT and the SWPPP with associated Erosion and Sediment Control Plans.

11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles, helicopters, equipment, and general construction activities would create noise above current ambient conditions. Construction–related noise could be audible from residential properties located near the transmission line. Noise impacts would be temporary and intermittent and would only occur during typical working hours (approx. 7 AM to 7 PM). There would be no long-term change in ambient noise following completion of the project.

12. Human Health and Safety

Potential for Significance: No

Explanation: Construction would be completed by trained professionals who would follow all applicable safety precautions as detailed in a site-specific Safety Plan, which would be prepared before the start of construction, maintained on-site during construction, and updated, as needed. The Safety Plan would include a Fire Prevention and Suppression Plan, and fire prevention and suppression equipment would be maintained on-site during construction. The general public would not be allowed in construction areas while work is ongoing, and work areas would be secured when construction crews are not present. Therefore, the proposed action would not be expected to impact human health and safety.

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: See Human Health and Safety above.

**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: CERCLA clean-up areas have been identified on the DOE Hanford Site, none of which have been identified in the project rights-of-way. On the Hanford Site radiological testing of excavated soils, used fiber optic cable, fiber optic wood poles, used guy wires, proposed for on or off-site disposal is required.

**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**

BPA mailed notification cards to private landowners and public land managers within the project area March 6, 2019. Additionally, public land managers were individually contacted and consulted with and asked to provide input regarding the project, project impacts, sensitive resources present, construction methods, and restoration requirements. The construction Contractor would be required to contact private and public land managers at least 30 days prior to the start of construction to coordinate access and work activities prior to work commencing.
Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Kevin George
Kevin George, EPI-4
Environmental Protection Specialist

Date: September 29, 2021