Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

Proposed Action: Comcast Cable Installation on North Bonneville-Ross Right-of-Way

Project No.: LURR-20190091

Project Manager: Charlene Belt – TERR-3

Location: Clark County, Washington


Description of the Proposed Action: Bonneville Power Administration (BPA) is proposing to allow Comcast to remove and replace 128 feet of existing above ground strand and coaxial cable with 225 feet of underground conduit and coaxial cable on BPA fee-owned property in Vancouver, WA.

The proposed project would be along E 18th Street on the North Bonneville-Ross No.1 and No.2 transmission line right-of-way between structures 34/5 and 35/1. There would also be a staging area east of structure 35/1 on the No. 2 line within the right-of-way. Project activities would include:

- Removing existing strand and coaxial cable between utility poles 3569/NT and 19180/NT under North Bonneville-Ross No. 1 transmission line
- Removing and replacing a 5-foot by 5-foot flag of sidewalk to excavate a bore pit
- Boring approximately 45 feet beneath E 18th Street, and installing 2-inch conduit and coaxial cable at least 36 inches below grade
- Trenching and/or boring approximately 175 feet along the southern edge of E 18th Street, and installing 2-inch conduit and coaxial cable at least 36 inches below grade
- Installing two 17-inch by 30-inch handholes in intercept coaxial cable drops

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/ W. Walker Stinnette
W. Walker Stinnette
Contract Environmental Protection Specialist
Portland State University – Hatfield Resident Fellow

Reviewed by:

/s/ Douglas F. Corkran
Douglas F. Corkran
Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel  Date: June 18, 2019
Sarah T. Biegel
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.

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Project Site Description

The project site is within BPA's North Bonneville-Ross No. 1 and No. 2 transmission line right-of-way (ROW), between structures 34/5 and 35/1, in Vancouver, Washington (Section 25, Township 2 North, Range 1 East). Project activities would be carried out along both sides of E 18th Street, where it crosses through the ROW. There would also be a staging area east of structure 35/1 on the No. 2 line within the ROW. The project area is disturbed and of low ecological quality, with ground cover consisting of paved sidewalk, exposed soils and gravel, and regularly mowed bunchy native and non-native herbaceous species, including English plantain (*Plantago lanceolata*), clover (*Trivoliurn sp.*), and dandelion (*Taraxacum sp.*). Within the ROW, a grass parking lot with a gravel entrance and access road is located immediately south of the project site, while a non-BPA owned substation is located immediately to the north. Outside of the ROW, the surrounding area is a mix of commercial and residential development. The closest water feature is Burnt Bridge Creek, which is located approximately 500 feet west and 350 feet south of the project site.

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
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<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
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**Explanation:** The BPA archaeologist completed background research and an intensive field survey of the proposed project area and determined that the actions would result in **No Adverse Effect to Historic Properties.** No previously recorded archaeological resources were located in the project area, and the archaeological field survey similarly found no archaeological resources. Two historic properties were identified within the ROW: the North Bonneville-Ross No. 1 and No.2 transmissions lines. However, the proposed activities would not diminish any of the standards under which they are considered eligible and would not result in an adverse effect.

Should any cultural resources be discovered during project activities, then all project work must stop, and the Environmental Protection Specialist should be notified immediately. No additional review under Section 106 of the National Historic Preservation Act (36 CFR 800.3 (a)(1)) is required for this action at this time.

| 2. Geology and Soils | ✔️                          |                                               |

**Explanation:** Geology and soils within and around the project site were previously disturbed during construction of E 18th Street and the adjacent substation and parking lot. Ground-disturbing activities would include excavating a bore pit, trenching or boring east-west along E 18th Street, boring north-south underneath E 18th Street, and installing two handholes to intercept coaxial cables. Excavated soils would be temporarily stored on-site, backfilled, and graded to original contours following installation of the new cable. Minor soil compaction may occur due to vehicle and equipment use. Comcast and its delegates would implement best management practices (BMPs) to address temporary erosion and sediment control. A Certified Erosion and Sediment Control Specialist or Certified Professional in Sediment and Erosion Control should be part of erosion and sediment control planning.
3. **Plants** (including Federal/state special-status species and habitats)

   **Explanation:** Project-related activities (e.g. vehicle and equipment use, excavation, and trenching) could result in removal of vegetative cover in small areas. There are no documented occurrences of any State special-status plant species or plant species protected under the Federal Endangered Species Act (ESA). Therefore, the proposed project would have no effect on protected plant species.

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

   **Explanation:** Temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during construction. There are no documented occurrences of any State special-status wildlife species or wildlife species protected under the Federal ESA. Therefore, the proposed project would have no effect on protected wildlife species.

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

   **Explanation:** Burnt Bridge Creek (approximately 500 feet west and 350 feet south of the project site) is potential migration habitat for coho salmon (*Oncorhynchus kisutch*) and steelhead trout (*Oncorhynchus mykiss*), both of which are listed as “Threatened” under the Federal ESA. Burnt Bridge Creek has also been designated by the National Marine Fisheries Service as critical habitat for coho salmon. The area between the creek and the project site contains suburban development, including built structures, grass and asphalt parking lots, landscaped areas, and a narrow riparian buffer. During and after construction activities, Comcast and its delegates would implement erosion and sediment control BMPs to prevent transport of sediment off-site. Therefore, the proposed project would have no impact on water bodies, floodplains, and special-status fish species.

6. **Wetlands**

   **Explanation:** The project site is not in or near any mapped wetlands, and no wetlands were observed during site visits. Comcast and its delegates would implement BMPs for temporary erosion and sediment control. Therefore, the proposed project would have no impact on wetlands.

7. **Groundwater and Aquifers**

   **Explanation:** Soil disturbance would not reach depths that would impact groundwater or aquifers. Therefore, the proposed project would have no impact on groundwater and aquifers.

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

   **Explanation:** There would be no change to land use at the project site. No specially-designated areas are in the project vicinity.

9. **Visual Quality**

   **Explanation:** Removing existing above ground coaxial cable and installing new cable below ground would not significantly change the visual quality of the area.

10. **Air Quality**

    **Explanation:** Temporary dust and vehicle emissions would increase in the local area during construction. There would be no long-term changes in air quality following completion of the project.

11. **Noise**

    **Explanation:** Construction noise would be temporary and would occur during daylight hours. There would be no long-term changes in noise levels following completion of the project.
12. **Human Health and Safety**

**Explanation:** No impacts to human health or safety are expected as a result of project activities.

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**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:**

- **☑** 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:**

- **☑** 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:**

- **☑** 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:**

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**Landowner Notification, Involvement, or Coordination**

**Description:** The ROW is BPA fee-owned. Adjacent landowners and ROW easement lessees would be notified of the upcoming project by BPA. Additionally, the Land Use Agreement would direct Comcast to coordinate with landowners.

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

**Signed:** /s/ W. Walker Stinnette  
Date: June 18, 2019

W. Walker Stinnette – EC-4  
Contract Environmental Protection Specialist  
Portland State University – Hatfield Resident Fellow