

memorandum

DATE: December 21, 2011

REPLY TO
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Dawneen Dostert
Project Manager – TERR-LMT

Proposed Action: Grant a request by the City of Longview, Washington to build the Highlands Trail in the Longview-Cowlitz No. 1 transmission line right-of-way

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

Location: Longview, Cowlitz County, Washington
Township 7N, Range 2W, Sections 5 and 6
Township 8N, Range 2W, Section 32

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA proposes to grant a multiple use request submitted by the City of Longview, Washington, to construct a paved recreational trail (the Highland Trail) for pedestrian and bicycle use on existing BPA transmission line right-of-way in Longview, Washington. The Highland Trail would be located on existing BPA fee-owned right-of-way property along the BPA Longview-Cowlitz No. 1, 115-kilovolt (kV) transmission line corridor. It would be built within a 70-foot-wide Reserve Area separating the Highlands Plats residential area and an industrial area to the south.

The paved asphalt trail would be 6,850 feet long and 10 feet wide, bordered on both sides by 2-foot gravel shoulders and 8 feet of landscaping (total width = 30 feet). Lighting would be installed along the trail in the landscaped area and would require 3-foot-deep foundations with below-ground conduit. The trail would extend from Oregon Way to Douglas Street for a total affected area of about 4.7 acres. Construction would involve excavation of existing soils to approximately 10–12 inches in depth, although 48-inch depths may be reached in some places. The City of Longview would pay for, plan, construct, own, and maintain the trail, and would be responsible for satisfying all Federal, State, and local permitting and environmental requirements relating to planning, construction, and maintenance of the trail. Work on the trail is scheduled to begin in 2012.

Analysis: The trail will run adjacent to Ditch 3 along SR-432, which has been designated as a 303d-listed stream by the Washington Department of Ecology (Ecology) under the Clean Water Act (CWA). Construction activities have the potential to generate minor erosion that could enter the stream, which is located 15–25 feet south of the trail. The City of Longview has stated that any erosion will be controlled by Best Management Practices (BMPs) in compliance with storm water

regulations, and that no work will be done on the slope of the ditch. The City of Longview is responsible for consulting with Ecology concerning 401 CWA permitting as well as any requirements pertaining to the 303d listing of Ditch 3, which may include restrictions on herbicide use and management of potential spills of hazardous materials such as vehicle fuel leaks.

Ditch 3 is located a little less than 0.5 mile from the Columbia River, which supports four fish species listed as threatened under the Endangered Species Act (ESA): Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*O. kisutch*), chum salmon (*O. keta*), and steelhead trout (*O. mykiss*). The Columbia River is listed as Critical Habitat under the ESA for the first three species as well as for bull trout (*Salvelinus confluentus*). In addition, potential habitat exists within the project site for Columbian white-tailed deer (*Odocoileus virginianus leucurus*), which is federally listed as endangered; and adjacent to the project site for Nelson's checker-mallow (*Sidalcea nelsoniana*), which is federally listed as threatened. There are no documented occurrences of either species within 1 mile of the project site. In response to the ESA, BPA has prepared an Effects Determination for the proposed project (HighlandsTrail_NE_Memo 2011). A determination of "No Effect" was made for all ESA-listed species, designated critical habitat, and essential fish habitat. No other threatened or endangered species, critical habitat, or other sensitive areas are known to exist within the project area.

In addition, two NEPA reviews of the project have been completed previously by the Washington Department of Transportation and by the City of Longview during the application process for a grant from the U.S. Department of Housing and Urban Development. In both cases, no significant impacts to the human environment were found.

On November 3, 2011, BPA initiated Section 106 consultation with the State of Washington Department of Archaeology and Historic Preservation (DAHP), The Confederated Tribes of the Chehalis, and the Cowlitz Indian Tribe. The DAHP had previously reviewed the Highland Trail project for the City of Longview and determined that there would be little risk of cultural impacts due to the nature and location of the proposed action. They had therefore cleared it to proceed without further cultural resources assessment or oversight. Based on this finding, BPA determined that the project will have no effect on cultural resources or historic properties as protected under the National Historic Preservation Act. A concurrence letter dated November 16, 2011 was received from the Washington State Historic Preservation Office (SHPO) regarding this determination, and no written reply was received from the tribes, although the Cowlitz Indian Tribe Cultural Resources Department had previously submitted a letter to the City of Longview containing Inadvertent Discovery Language.

Findings: BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, has not been segmented to meet the definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of

applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Kara Hempy-Mayer
Kara Hempy-Mayer
Environmental Project Manager

Concur:

/s/ Richard Yarde
Richard Yarde
Acting NEPA Compliance Officer

Date: December 21, 2011

Attachment:
Environmental Checklist for Categorical Exclusions

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Highlands Trail

Work Order #: 20110023

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

| <u>Environmental Resources</u> | <u>No Potential for Significance</u> | <u>No Potential, with Conditions (describe)</u> |
|---|--------------------------------------|---|
| 1. Historic Properties and Cultural Resources | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. T & E Species, or their habitat(s) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Floodplains or wetlands | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Areas of special designation | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Health & safety | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Prime or unique farmlands | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Special sources of water | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 8. Other (describe) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Signed: /s/ Kara Hempy-Mayer

Date: December 21, 2011