Clark Public Utilities
Customer-owned, customer-focused

STATE ENVIRONMENTAL POLICY ACT (SEPA) DETERMINATION OF NONSIGNIFICANCE

Name of proposal:
Enterprise Transmission Line

Description of proposal:
This proposal is for the construction of a new 5-mile, 115 kilovolt overhead electrical transmission line that will connect the Union Ridge substation at South 5th Street and South 85th Avenue in the City of Ridgefield, Washington to the approved Enterprise substation (Clark County approval PSR2011-00031) at the northeast corner of Northwest 324th Street and Northwest 26th Avenue in Clark County, north of the City of La Center, Washington. Construction is expected to start in summer or fall of 2018 or later.

Proponent:
Public Utility District No. 1 of Clark County, Washington
P.O. Box 8900
Vancouver, WA 98668
Phone: (360) 992-8781
Contact Person: David Tetz dtetz@clarkpud.com

Location of proposal, including street address, if any:
The transmission line starts at the Union Ridge substation and runs north along NE 10th Avenue, then west along NE/NW 279th Street to N 65th Avenue/NW 11th Avenue where it turns north. The line continues north to NW 299th Street, then west to NW Paradise Park Road, then north to NW 324th Street. The route continues east along NW 324th Street ending at the Enterprise substation at 32405 NW 26th Avenue.

Lead Agency:
Public Utility District No. 1 of Clark County, Washington
Clark Public Utilities (CPU) has determined that this proposal will likely not have a significant adverse impact on the environment. An environmental impact statement is therefore not required as dictated by state law (RCW 43.21C.030(2)(c). The DNS was made after Clark Public Utilities reviewed a completed Environmental Checklist on the proposal, as required under WAC 197.11.330(1)(a)(i), and other information relevant to the project, which is on file at the utility's Electric Operations Center. Documents relevant to the proposal are available for review upon request.

We will **not act on this proposal for 14 days** from the date of issue. Other Agencies, affected tribes, and members of the public are invited to comment on this DNS. We must receive your comments within 14 days, or by **May 21st, 2018** to the *contact person* (see above). At the close of the comment period a review of those comments will lead to further actions in accordance with state law.

Responsible Official: Cal Morris
Position/Title: Director of Engineering
Phone: (360) 992-8573
Address: P.O. Box 8900 Vancouver, WA 98668
Date of Issue: May 7th, 2018

Signature: Cal Morris

SEPA Environmental Checklist

Washington Administrative Code (WAC) 197-11-960

Purpose of checklist:

The State Environmental Policy Act (SEPA), Revised Code of Washington (RCW), Chapter 43.21C, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and agencies identify impacts from your proposal and to help agencies decide whether or not an EIS is required.

Instructions for applicants:

This environmental checklist asks you to describe basic information about your proposal. Governmental agencies use this checklist to determine whether or not the environmental impacts of your proposal are significant. Please answer the questions briefly, giving the most precise information or best description known. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply."

Some questions pertain to governmental regulations such as zoning, shoreline, and landmark designations. If you have problems answering these questions, please contact the Clark County Permit Center for assistance.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. You may be asked to explain your answers or provide additional information related to significant adverse impacts.

Use of checklist for non-project proposals:

Complete this checklist for non-project proposals (e.g., county plans and codes), even if the answer is "does not apply." In addition, complete the supplemental sheet for non-project actions (Part D).

For non-project actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

Community Development
1300 Franklin Street, Vancouver, Washington
Phone: (360) 397-2375 Fax: (360) 397-2011
www.clark.wa.gov/development

A. Background

1. Name of proposed project, if applicable:

Enterprise Transmission Line

2. Name of applicant:

David Tetz, Clark Public Utilities

3. Address and phone number of applicant and contact person:

Applicant: David Tetz, Manager of Construction Design
Address: P.O. Box 8900
Vancouver, WA 98668
Phone Number: (360) 992-8781

Contact Person: Don Hardy, Senior Planner and Project Manager
Address: BergerABAM
210 East 13th Street, Suite 300
Vancouver, WA 98660
Phone Number: (360) 823-6115

4. Date checklist prepared:

April 2018

5. Agency requesting checklist:

Clark Public Utilities (CPU)

6. Proposed timing or schedule (including phasing, if applicable):

Construction is anticipated to begin in the 3rd quarter of 2018 and be completed by the 2nd quarter of 2019.

7. Do you have any plans for future additions, expansion, or further activity related to this proposal? If yes, explain.

There are no future additions, expansions, or further activity related to the Enterprise Transmission Line project. The applicant will construct a new substation (Enterprise Substation), where this project's alignment terminates north of La Center. This substation received preliminary land use approval by the County on 18 November 2011 (PSR2011-00031).

8. List any environmental information that has been or will be prepared related to this proposal.

The following environmental information has been prepared for the Enterprise Transmission Line project:

- *Critical Areas Report (Ridgefield), BergerABAM, March 2018*
- *Critical Areas Report (La Center), BergerABAM, March 2018*

- *Cultural Resources Report, AINW, August 2017*
- *Wetland Delineation and Assessment, BergerABAM, July 2017*
- *Mitigation Bank Use Plan, BergerABAM, January 2018*
- *Wetland and Habitat Mitigation Plan (Clark County), BergerABAM, December 2017*

9. Are other applications pending for governmental approvals affecting the property covered by your proposal? If yes, please explain.

   There are no known pending applications for governmental approvals for properties that will be directly affected by the proposed project action.

10. List any government approvals or permits needed for your proposal:

    The following government permits or approvals will be required for the project:

State:
- *State Environmental Policy Act (SEPA) Checklist*

Local:
- *Ridgefield and La Center Site Plan Review*
- *Ridgefield and La Center Critical Areas Permits*
- *Clark County Wetland and Habitat Permit*
- *La Center Right-of-Way Permit*
- *Ridgefield Encroachment Permit*

11. Give a brief, complete description of your proposal, including the proposed uses and size of the project and site. There are several questions addressed later in this checklist asking you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

    The Enterprise Transmission Line is an approximately 5-mile, 115 Kilovolt (Kv) overhead transmission line that will connect the Union Ridge substation at South 5th Street and Northeast 10th Avenue in the City of Ridgefield (Ridgefield), Washington to the approved Enterprise substation (Clark County approval PSR2011-00031) at the northeast corner of Northwest 324th Street and Northwest 26th Avenue in Clark County, north of the City of La Center (La Center), Washington. The transmission line will be constructed of approximately 76.5-foot-tall single wood poles, spaced approximately 200 to 250 feet apart and framed in the "trimline style," which Clark Public Utilities describes as the lowest and most aesthetically pleasing profile. 78-foot-tall metal poles will also be required at certain road intersections where a change of direction of the alignment requires more line tension, and therefore a sturdier pole. The proposed utility poles will be placed on a mixture of private easements, adjacent to road rights of way or within road rights of way. In addition, the project will require undergrounding of existing electrical distribution lines from the Shell Station in La Center to the location of the future Enterprise substation located in northern Clark County. Undergrounding will be completed by open trench construction, and will result in approximately 2,000 cubic yards of material removal. Earth that is removed during the undergrounding process will be backfilled into the trench once project construction is complete. The proposed transmission line will remain overhead throughout the entire alignment. The purpose of the project is to improve service reliability and decrease outage time for north Clark County during inclement weather. The project is anticipated to be constructed in the next year.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including street address, section, township, and range. If this proposal occurs over a wide area, please provide the range or boundaries of the site. Also, give a legal description, site plan, vicinity map, and topographic map. You are required to submit any plans required by the agency, but not required to submit duplicate maps or plans submitted with permit applications related to this checklist.

The transmission line route crosses three jurisdictions: Clark County, La Center, and Ridgefield. The southern terminus of the project starts in Ridgefield at the Union Ridge substation and runs north along N 85th Avenue, then turns west and runs along NW 279th Street to NW 11th Avenue where it turns north. The line leaves Ridgefield jurisdiction near the intersection of NW 11th Ave/NW 289th Street and continues north in Clark County until NW 299th Street. At the intersection of NW 299th Street and NW 11th Avenue, the route turns west and runs along NW 299th Street to NW Paradise Park Road, then turns north/northwest and runs along NW Paradise Park Road. The line leaves the jurisdiction of Clark County and enters that of the City of La Center at the southern boundary of parcel #211242000. The route continues along NW Paradise Park road and crosses NW La Center Road at the new interchange, then re-enters Clark County jurisdiction at the southern boundary of parcel #209746000. The route continues along NW Paradise Park Road and then turns east and cuts across parcel #986028840 and runs adjacent to NW 324th Street. The route continues east along NW 324th Street until the line turns north at NW 26th Avenue where the line will connect to the future Enterprise substation on parcel #986027200.

B. Environmental Elements

Agency use only

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____.

The project alignment traverses approximately 5 miles of land. As such, topography of the site varies greatly. The southern portion of the alignment consists primarily of farm and residential land, which is generally flat with little discernable slope. The northern portion of the alignment transitions to a residential/commercial mix of uses situated on land with varying slopes; therefore, "rolling" land was used as the most appropriate description of the variation of landscape throughout the project alignment.

b. What is the steepest slope on the site and the approximate percentage of the slope?

According to the Clark County GIS database, the topography within the transmission line route is generally rolling with slopes between 0 to 15 percent, with some areas having slopes greater than 15 percent. The proposed alignment will avoid placing poles in areas that are designated as potentially unstable.

c. What general types of soils are found on the site (e.g., clay, sand, gravel, peat, muck)? Please specify the classification of agricultural soils and note any prime farmland.

According to the United States Department of Agriculture (USDA), soils in the project area generally consist of:

- *Gee silt loam, 0 to 8 percent slope (GeB) (USDA farmland classification: prime farmland)*
- *Gee silt loam, 8 to 20 percent slope (GeD) (USDA farmland classification: farmland of statewide importance)*
- *Gee Silt Loam, 30 to 60 percent slope (GeF) (USDA farmland classification: not prime farmland)*
- *Puyallup Fine Sandy Loam, 0 to 30 percent slope (PuA) (USDA farmland classification: prime farmland)*
- *Hillsboro silt loam, 0 to 3 percent slope (HoA) (USDA farmland classification: prime farmland)*
- *Hillsboro silt loam, 3 to 8 percent slope (HoB) (USDA farmland classification: prime farmland)*
- *Odne silt loam, 0 to 8 percent slope (OdB) (USDA farmland classification: not prime farmland)*
- *Sara silt loam, 0 to 8 percent slope (SIB) (prime farmland if drained)*

A portion of the proposed alignment will occur adjacent to land that is currently used for commercial agriculture activities; however, no adverse impacts to this land will result from the project.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, please describe.

The Clark County GIS database indicates that there are areas of potential instability (slopes 25-40 percent, severe erosion hazard, and a potential landslide hazard) along the transmission line route, approximately 0.5 miles south of exit 16 from Interstate-5 to La Center, along NW Paradise Park Road. These potentially geologic hazardous areas will be avoided by project construction.

e. Describe the purpose, type, and approximate quantities of any filling or proposed grading. Also, indicate the source of fill.

The project will not require cut/fill, as it is not anticipated that grade changes will be necessary. Excavation quantities required for pole placement will be negligible. If there is excess spoils during pole augering, these spoils will be removed from the site.

The project will require approximately 2,000 linear feet of undergrounding to accommodate existing electrical distribution lines north of the City of La Center's jurisdiction. Undergrounding will be conducted through open trenching. It is anticipated that approximately 2,000 cubic yards of material will be temporarily displaced during the trenching process. Once the distribution lines are installed, the spoils will be backfilled into the trench to cover the undergrounded distribution lines.

f. Could erosion occur as a result of clearing, construction, or use? If so, please describe.

It is not anticipated that erosion will occur as a result of the installation of the power poles as the project will comply with applicable Ridgefield, La Center, and County erosion control standards.

g. What percentage of the site will be covered with impervious surfaces after the project construction (e.g., asphalt or buildings)?

Less than 1 percent of the project area will be covered with impervious surfaces after the project is complete. The only impervious surface created by the proposed project is the base of the power poles (approximately 105 power poles).

h. Proposed measures to reduce or control erosion, or other impacts to the earth include:

If necessary, erosion control best management practices (BMPs) will be implemented, consistent with the erosion prevention and sediment control plan requirements of Ridgefield, La Center, and Clark County. Possible erosion control measures include but are not limited to:

- *Vegetated buffers where feasible*
- *Sild fence where needed*
- *Removal of excess trench and pole auguring spoils from critical areas*
- *Stabilize and reseed exposed soil*
- *Avoidance of mobile refueling in or around critical areas*

2. Air

a. What types of emissions to the air would result from this proposal (e.g., dust, automobile, odors, industrial wood smoke) during construction and after completion? Please describe and give approximate quantities.

It is anticipated that project construction will result in short-term insubstantial impacts to air quality. During construction, air emissions will result from the use of heavy equipment and the additional traffic generated by construction workers traveling to and from the project area. Emissions will include exhaust from diesel- and gasoline-powered equipment, dust from backfilling and excavation activities, windblown dust from exposed dirt, and road dust from delivery trucks. It is not anticipated that these emissions will result in significant adverse impacts and the measures proposed under section B.2.c below will be employed to reduce or control impacts to air.

The construction of the proposed project will result in greenhouse gas (GHG) and aerosol emissions. These emissions are expected to come from the following sources:

- *Increased light vehicle, and truck traffic; and*
- *Increased traffic from additional workers*

Increases in emissions that may occur during construction will be temporary in nature and are not expected to contribute substantially to

overall GHG emissions. No GHG emissions are anticipated from operation of the proposed project.

Because the construction of the proposed project is anticipated to result in only minimal short-term GHG emissions and its operation will result in no long-term emissions of GHG, no significant direct, indirect, or cumulative impacts to air quality are anticipated to result from the proposed project.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, please describe.

The proposed project is surrounded by agricultural, residential, and commercial land uses which are not know to produce noxious odors or emissions. As the proposed project is a transmission line, which is not susceptible to impacts cause by emissions or odors, no off-site emissions or odors will negatively affect the project.

c. Proposed measures to reduce or control emissions or other impacts to air:

In order to limit emissions from construction, construction equipment and vehicles will be outfitted with standard manufacturer's emission control equipment and may operate using bio-based lubricants and fuels, such as biodiesel. Construction and staging areas will be designed to reduce equipment wait times and engine idling. These measures will reduce fuel consumption and emissions.

Construction activities are not expected to cause significant air quality impacts

3. Water

Agency use only

a. Surface:

1) Is there any surface water body on or in the vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, and wetlands)? If yes, describe the type and provide names and into which stream or river it flows into.

The project alignment will be located within the vicinity of surface waters in all three jurisdictions which the alignment passes through (Ridgefield, Clark County, and La Center).

Ridgefield

Riparian Areas and Buffers

The project corridor within Ridgefield jurisdiction contains a tributary to McCormick Creek, a Type F stream. Additionally, a Type Ns stream is mapped as flowing parallel to NE 10th Avenue along the eastern extent of NE 279th Street; however, during multiple site visits, certified biologists encountered no positive indicators of stream hydrology (i.e., defined bed and banks with active erosion). Therefore, the scientists determined that the GIS mapping for the Type Ns stream is erroneous and no stream exists.

RDC 18.280.110(B) designates minimum riparian buffer widths for stream types in accordance with the DNR Stream Typing System. The ordinance further breaks Type F streams into those less than 5 feet and more than 5 feet wide. Streams less than 5 feet wide have a designated buffer width of 125 feet and those greater than 5 feet wide have a designated buffer width of 150 feet. The portion of the tributary to McCormick Creek within the utility corridor is on average 5 feet wide; accordingly, a 150-foot riparian buffer applies.

Wetlands and Wetland Buffers

A wetland delineation was conducted for the entire project alignment in accordance with the US Army Corps of Engineers Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region Version 2 (USACE 2010). The delineation identified three wetlands within Ridgefield jurisdiction, hereby referenced as wetlands D, E, and F. The table below contains applicable wetland buffers based on Ridgefield's buffer width standards.

Wetland	Wetland Classification			Habitat Functions Buffer (ft)
	HGM	Level of Habitat Function (Score)	Wetland Rating	
Wetland D	Depressional	Moderate (5)	IV	25
Wetland E	Depressional	Low (3)	III	40
Wetland F	Depressional	Low (3)	III	40

Clark County

Riparian Areas and Buffers

Three streams were identified within Clark County, all tributaries of McCormick Creek. The first has headwaters west of I-5, flows northeast through culverts, and is discharged on the east side of Paradise Park Road. Upstream of the culverts, this stream is mapped as a Type Ns stream; downstream of the culverts, within the transmission line corridor, the stream is mapped as a Type F (fish-bearing) stream (WDNR 2017). The other two streams are located along the western portion of 299th Street; both are mapped as Type Ns streams as they cross the transmission line corridor, however the stream to the east is mapped as a Type F (fish-bearing stream just north of the project corridor. The table below summarizes the characteristics of the streams identified within the project alignment in Clark County Jurisdiction.

Stream	Stream Classification		Riparian Buffer Width[c]
	Stream Order[a]	Stream Type[b]	
Paradise Park Road	1	F	200
299th west	1	Ns	75
299th east	1	Ns	75

Notes:

[a] Strahler stream ordering system (A.N. Strahler 1952)

[b] DNR stream classification system (WAC 222-16)

[c] Based on CCC 40.440.010.C.1.a

Wetlands and Wetland Buffers
BergerABAM scientist's investigation of hydrology, soils, and vegetation identified three wetlands within the County's jurisdiction, Wetlands A, B, and C. The table below contains wetland buffer widths in accordance with Clark County standards.

	Wetland Classification			Low Land Use Intensity	
Wetland	HGM	Habitat Score	Wetland Rating	Water Quality Function Buffer (ft)	Habitat Functions Buffer (ft)
Wetland A	Riverine	6	III	40	65
Wetland B	Depressional	4	IV	25	25
Wetland C	Slope	6	III	40	65

La Center
Riparian Areas and Buffers
There is one confirmed stream within the La Center portion of the project alignment. The identified stream (Type Ns) flows east from Paradise Park Road before converging with another stream and heading north. As a Type Ns waterbody, the unnamed stream identified on site is provided with a 75 foot habitat buffer in LCMC Table 18.300.090(2)(f); the buffer protects the functions and values of the stream and its associated riparian habitat.

All surface waters within the project alignment drain to, or are a tributary of the East Fork Lewis River.

2) Will the project require any work within 200 feet of the described waters? If yes, please describe and attach available plans.

Yes, the proposed project alignment will require work within 200 feet of the wetlands and streams identified above. The attached critical area reports and wetland and habitat mitigation plan include descriptions detailed descriptions of surface waters, surface water impacts, and proposed mitigation.

Ridgefield
Riparian Areas and Buffers
The project, which runs perpendicular across the on-site tributary to McCormick Creek and parallel to N 10th Street, will result in approximately 3,046 square feet of impacts to the 150-foot riparian buffer. All trees and shrubs within a ten-foot radius (314 square feet) at the proposed pole locations would need to be cleared for construction and maintenance, and a 20-foot-wide corridor throughout the length of the transmission line will need to be cleared of trees that may potentially come into contact with the transmission line.

Vegetation removal cannot be avoided, it is necessary to clear vegetation for the safety of maintenance workers and the surrounding community, to ensure there is no disruption in power supply, and to protect the utility poles and conductors from damage. Vegetation clearing between poles will result in 3,021 square feet of impacts, and an additional 25 square feet of impact resulting from the installation of two utility poles for a total of 3,046 square feet of impacts to riparian buffers.

	Impacts from Clearing 20-Foot Corridor (sq ft)	Impacts from Clearing for Utility Pole Installation (sq ft)	Total
Inner Buffer Trees/Shrubs >12" DBH	2,878	0	2,878
Inner Buffer Trees/Shrubs <12" DBH	143	0	143
Outer Buffer Pasture/Grass	0	25	25
Riparian Buffer	3,021	25	3,046

Wetlands and Wetland Buffers

The project will result in approximately 1,595 total square feet of impacts to wetlands and 314 square feet of wetland buffer. Impacts will result from clearing of woody vegetation and installation of the utility poles. All trees and shrubs within a ten-foot radius (314 square feet) at the proposed pole locations would need to be cleared for construction and maintenance, and to ensure that there is no potential for trees to come into contact with the transmission line. At those locations where no woody vegetation is present, impacts will be equivalent to the footprint of the utility pole (12.5 square feet). Vegetation removal cannot be avoided, it is necessary to clear vegetation for access to pole locations, to ensure the safety of construction and maintenance workers and the surrounding community, and to protect the utility poles and conductors from damage. Vegetation clearing will result in 1,595 square feet of impacts to wetlands.

Proposed Impacts	Square Feet			
	Wetland D	Wetland E	Wetland F	Total
Wetland Impacts	653	314	628	1,595
Wetland Buffer Impacts	0	314	0	314

Mitigation

Impacts to surface waters or their buffers within Ridgefield jurisdiction will result in 1,595 square feet of impacts to wetlands, 314 square feet of wetland buffer impact, and 3,046 square feet of impact to riparian buffers. Impacts will be mitigated through purchase of credits at the East Fork Lewis River Mitigation Bank as described below.

Impact Area	Impacts for Bank Use (acres)	Ecology Rating	Acre-Credit Ratio	Acre-Credits Proposed for Purchase
Wetland D	0.015	IV	0.85:1	0.013
Wetland E	0.007	III	1:1	0.007
Wetland F	0.014	III	1:1	0.014
Wetland E Buffer	0.007	--	0.2:1	0.0014
Inner Riparian Buffer - <12" DBH	0.066	--	0.75:1	0.05
Outer Riparian Buffer - < 12" DBH	0.003	--	0.5:1	0.0015
Outer Riparian Buffer -	0.0005	--	0.25:1	0.0001

Pasture				
TOTAL	0.1126			0.087

Clark County

Riparian Areas and Buffers

The project will result in approximately 15,830 total square feet (0.36 acre) of impacts to the 75- and 200-foot riparian buffers in the jurisdiction of Clark County. Impacts will result from clearing of woody vegetation for the 20-foot transmission line corridor. No impacts will occur below the OHWM of any waterbody. These impacts have the potential to reduce riparian habitat functions for terrestrial wildlife and aquatic species associated with the McCormick Creek tributaries, and will require mitigation. Mitigation is based on the size of the trees, and whether the impacts are located within the inner 50 percent of the riparian buffer or the outer 50 percent.

	Paradise Park creek	299th creek west	299th creek east	Total
Inner Buffer Trees > 12" DBH	4,094	0	0	**4,094**
Outer Buffer Trees > 12" DBH	4,827	0	0	**4,827**
Inner Buffer Trees < 12" DBH	0	1,514	0	**1,514**
Outer Buffer Trees < 12" DBH	0	1,524	3,871	**5,395**
Proposed Impacts (square feet)	8,921	3,038	3,871	**15,830**

Wetlands

Permanent wetland impacts are proposed to each of the wetlands in the jurisdiction of Clark County. The project will result in approximately 339 total square feet of impacts to the wetlands. Impacts will result from clearing of woody vegetation and installation of the utility poles. All trees and shrubs within a ten-foot radius (314 square feet) at the proposed pole locations would need to be cleared for construction and maintenance, and to ensure that there is no potential for trees to come into contact with the transmission line. At those locations where no woody vegetation is present, impacts will be equivalent to the footprint of the utility pole (12.5 square feet). There are no utility poles proposed for placement within the buffers of any of the wetlands within the jurisdiction of Clark County, and no permanent or temporary impacts proposed within the buffers of these critical areas

	Wetland A	Wetland B	Wetland C	Total
Proposed Impacts (square feet)	314	12.5	12.5	**339**

Mitigation

To ensure no net loss of wetland functions or values, the 339 square feet of wetland impacts will be mitigated through the purchase of mitigation credits at the East Fork Lewis River Mitigation Bank.

To ensure no net loss of buffer functions or values, the 15,830 square feet of buffer impacts will also be mitigated through the purchase of mitigation credits at the East Fork Lewis River Mitigation Bank. Located in the East Fork Lewis River watershed, the mitigation bank will provide high quality riparian habitats and functions in the same watershed in which impacts are proposed.

Natural Resource	Resource Impact Area (acres)	Ecology Rating	Acre-Credit Ratio	Acre-Credits Proposed for Purchase
Wetland A	0.007	III	1:1	0.007
Wetland B	0.0003	IV	0.85:1	0.0003
Wetland C	0.0003	III	1:1	0.0003
Riparian Buffer Inner >12" DBH	0.09	--	1:1	0.09
Riparian Buffer Outer > 12" DBH	0.11	--	0.75:1	0.083
Riparian Buffer Inner <12" DBH	0.034	--	0.75:1	0.025
Riparian Buffer Outer < 12" DBH	0.124	--	0.5:1	0.06
TOTAL	0.365			0.27

La Center

Riparian Area and Buffers

The project corridor, which runs through the headwaters and riparian buffer of the tributary to McCormick Creek, will result in approximately 2,703 square feet of impacts to the 75-foot riparian buffer. Impacts will result from clearing of woody vegetation and installation of a utility pole. All trees and shrubs within a ten-foot radius (314 square feet) at the proposed pole locations would need to be cleared for construction and maintenance, and a 20-foot-wide corridor throughout the length of the transmission line will need to be cleared of trees that may potentially come into contact with the transmission line.

Vegetation clearing between poles will result in 2,389 square feet of impacts to the riparian buffer, and an additional 314 square feet of impact will result from clearing for the installation of a utility pole, for a total of 2,703 square feet of impacts to riparian buffers.

Mitigation

To ensure no net loss of buffer functions or values, the 2,703 square feet (0.061 acres) of riparian buffer impacts that cannot be mitigated for on site will be mitigated through the purchase of mitigation credits at the East Fork Lewis River Mitigation Bank. Riparian buffer mitigation ratios for this project were determined in cooperation with WDFW.

Critical Area	Permanent Impacts (acres)	Acre-Credit Ratio	Credits Proposed for Use
Inner Riparian Buffer – Shrubs/trees <12" DBH	0.036	0.75:1	0.027
Outer Riparian Buffer – Shrubs/trees <12" DBH	0.025	0.5:1	0.0125

Total	0.061	–	0.04

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

The proposed project will not require any fill or dredge material to be placed in or removed from surface waters or wetlands beyond the placement of the utility poles. However, the project will require placement of utility poles within surface waters or surface water buffers as described above.

4) Will the proposal require surface water withdrawals or diversions? Please provide description, purpose, and approximate quantities:

The proposed project will not require any surface water withdrawals.

5) Does the proposal lie within a 100-year floodplain? If so, please note the location on the site plan.

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel Numbers 53015C1005G, 53015C1005G, 53015C1010G and 53015C1020G, the proposed project area is not within an area designated as 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The proposed project will not involve any discharge of waste materials to surface waters.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Please give description, purpose, and approximate quantities.

The proposed project will not involve the withdrawal of groundwater or any discharge to ground water.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources; (e.g., domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the size and number of the systems, houses to be served; or, the number of animals or humans the systems are expected to serve.

The proposed project does not involve the discharge of any waste materials to the ground.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal. Include quantities, if known. Describe where water will flow, and if it will flow into other water.

Agency use only

The proposed project does not increase the amount of runoff, including stormwater, and the project therefore does not include any measures to collect or dispose of runoff.

2) Could waste materials enter ground or surface waters? If so, please describe.

No waste material is expected to enter ground water or surface water as a result of the construction or operation of the proposed project.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

It is not anticipated that the proposed project will result in surface, ground, or runoff water impacts. If necessary, during project construction, BMPs will be employed; these may include silt fencing, soil stabilization, inlet protection, a construction entrance, and stockpile protection. Additionally, the proposed project will comply with the erosion prevention and sediment control plan requirements of the Ridgefield, La Center, and the County.

4. Plants

a. Check or circle types of vegetation found on the site

- Deciduous tree: alder, maple, aspen, other: Oregon Ash, Black Cottonwood, and Oregon White Oak
- Evergreen tree: fir, cedar, pine, other
- Shrubs
- Grass
- Pasture
- Crop or grain
- Wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other: Canary grass, velvetgrass, annual blue grass, and other various grass
- Water plants: water lily, eelgrass, milfoil, other
- Other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Vegetation removal for the project will be limited to the minimum necessary to accommodate the proposed alignment. Installation of the poles will primarily impact grass and shrubs; however, select tree removal will be required, especially in the County portion of the alignment along NW Paradise Park Road. The hired contractor will restore disturbed areas to

their existing condition, which in most cases will consist of reseeding with grass.

c. List threatened or endangered species on or near the site.

The US Fish and Wildlife Service (USFWS) has listed Golden Paintbrush (Castilleja levisecta) for the entire project alignment and water howellia (Howellia aquatilis) within Ridgefield. However, neither the species, nor their habitats, were observed during the site assessment conducted by BergerABAM scientists.

d. List proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site:

To mitigate for impacts to vegetation, the contractor will restore disturbed areas to their existing condition. In most cases this will include reseeding of disturbed soils. Where on-site mitigation is deemed infeasible to compensate for loss of habitat function or values, the applicant will purchase mitigation credits from the East Fork Lewis River mitigation bank, which serves the same drainage basin as the land subject construction impacts.

5. Animals

a. Circle any birds and animals which have been observed on or near the site:

- Birds: hawk, heron, eagle, songbirds, other;
- Mammals: deer, bear, elk, beaver, other; and,
- Fish: bass, salmon, trout, herring, shellfish, other.

b. List any threatened or endangered species known to be on or near the site. Agency use only

The IPaC web application identifies the potential presence of three threatened or endangered species within the project area: streaked horned lark (Eremophila alpestris strigata), yellow-billed cuckoo (Coccyzus americanus), and bull trout (Salvelinus confluentus). However, neither these species, nor their habitats, were observed during the site inspection conducted by BergerABAM scientists.

c. Is the site part of a migration route? If so, please explain.

The general area of the proposed project is within the Pacific Flyway, a broad migratory corridor that extends from Alaska to Central America and is used by waterfowl, eagles, hawks, falcons, songbirds, sandhill cranes, and shorebirds (WDFW Management Recommendations for Washington's Priority Species, Volume IV, Birds). The project area is located adjacent to a known waterfowl concentration. However, the proposed project is not anticipated to result in a decrease in available concentration area.

d. List proposed measures to preserve or enhance wildlife:

No significant adverse impacts to wildlife are anticipated as a result of the proposed project and, therefore, no measures to preserve or enhance wildlife are proposed.

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The proposed project is an electrical transmission line and will have no energy needs upon completion.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, please describe.

The narrow profile of the proposed transmission poles will prevent negative impacts to solar usage on adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts:

The proposed project includes no energy conservation features, as no energy consumption is required.

7. Environmental health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, please describe.

Environmental health hazards are not anticipated to increase as a result of the proposed project. The project consists of utility poles that are pre-treated with pentachlorophenol or copper naphthnate which is a standard utility pole treatment. Existing utility poles will be disposed at landfill approved for treated wood.

1) Describe special emergency services that might be required.

The need for special emergency services is not anticipated.

2) Proposed measures to reduce or control environmental health hazards, if any:

Although environmental health hazards are not anticipated to increase as a result of the proposed project, to minimize the possibility of any environmental health hazards, the project includes standard safety

procedures for the installation and maintenance of electrical transmission lines. In addition, the applicant's contract with their selected contractor will include a provision that requires pole disposal to occur only in a landfill approved for treated wood.

b. Noise

1) What types of noise exist in the area which may affect your project (e.g., traffic, equipment, operation, other)?

The existing noise in the project area consists primarily of traffic on the adjacent roadways. This type of noise will not affect the proposed project, as transmission lines are not a noise sensitive land use.

2) What types and levels of noise are associated with the project on a short-term or a long-term basis (e.g., traffic, construction, operation, other)? Indicate what hours the noise would come from the site.

The construction of the proposed project may result in localized, short-term noise impacts, as would be typical of new construction. The project will create no long-term noise impacts

Agency use only

3) Proposed measures to reduce or control noise impacts:

Short-term noise impacts are not anticipated to be significant, but will be mitigated if required by using standard techniques for the control of noise sources during construction. Contractors will be required to comply with the maximum noise level provisions of WAC 173-60 during construction. In addition, all engine-powered equipment will be required to have mufflers installed according to the manufacturers' specification.

No measures are proposed for long-term noise, as no long-term noise is anticipated from the proposed project.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties?

The current use of the project area along the proposed route of the transmission line varies. The route is adjacent to the rights of way of several different roads in a mostly rural setting. The route traverses many active agricultural fields, several fallow fields, several riparian drainages, and four forested areas. Other uses within the vicinity of the site include small-scale commercial, residential, and recreation (golf course).

b. Has the site been used for agriculture? If so, please describe.

As stated above, the route will run adjacent to many active and former agricultural fields. The active fields are used as pasture for livestock or for the production of commercial crops. The fallow fields are covered in non-

native, weedy grass and herbaceous species typical of unmaintained areas. No significant adverse impacts will occur to agricultural land.

c. Describe any structures on the site.

The proposed project route is in a mostly rural setting. The route will run adjacent to some residential, commercial, and agricultural structures.

d. Will any structures be demolished? If so, please describe.

No structures will be demolished as a result of this project; however, old distribution poles along the proposed alignment will be removed, and the existing distribution lines will be transferred onto the proposed transmission poles.

e. What is the current zoning classification of the site?

The proposed project crosses several zones in three jurisdictions. The table below lists each zoning and comprehensive plan designation by jurisdiction.

Table 1. Clark Public Utilities Transmission Line Zoning and Comprehensive Plan Designations

Jurisdiction	*Zone*	*Comp Plan*
Ridgefield	• *Commercial Regional Business (CRB)* • *Employment (E)* • *Commercial Neighborhood Business (CNB)*	• *General Commercial (GC)* • *Neighborhood Commercial (NC)* • *Employment (EM)*
Clark County	• *Agriculture (AG-20)* • *Business Park (BP)* • *Light Industrial (IL)* • *Rural-10 (R-10)* • *Rural-5 (R-5)*	• *Agriculture (AG)* • *Industrial (I)* • *Rural (R)*
La Center	• *Junction Plan (JP)*	• *Junction Plan (JP)*

f. What is the current comprehensive plan designation of the site?

Please see Table 1 above.

g. What is the current shoreline master program designation of the site?

According to Clark County's GIS database, the proposed project alignment will not occur within a designated shoreline.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, please specify.

According to Clark County's GIS database, the proposed project area includes sensitive lands including wetlands, riparian areas, critical aquifer recharge areas, and fish and wildlife habitat conservation areas.

i. How many people would reside or work in the completed project?

The proposed project does not include any residences or other habitable structures, and no one will live or work within the completed project.

j. How many people would the completed project displace?

No people will be displaced by the completed project.

k. Please list proposed measures to avoid or reduce displacement impacts:

Since no displacement impacts are anticipated, no mitigation measures are proposed.

l. List proposed measures to ensure the proposal is compatible with existing and projected land uses and plans:

The proposed project is an outright permitted use in all applicable zoning districts. The project will comply with all applicable land use regulations as demonstrated in project specific applications which were submitted to each respective jurisdiction which the alignment crosses through.

9. Housing Agency use only

a. Approximately how many units would be provided? Indicate whether it's high, middle, or low-income housing.

No housing units will be provided with the proposed project.

b. Approximately how many units, if any, would be eliminated? Indicate whether it's high, middle, or low-income housing.

No housing units will be eliminated by the proposed project.

c. List proposed measures to reduce or control housing impacts:

There are no impacts: therefore, no control measures are proposed.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas? What is proposed as the principal exterior building materials?

The tallest structures proposed are the 78-foot-tall metal utility poles. The project will require the installation of metal poles near select road intersections, when required to maintain tension for the transmission wiring.

b. What views in the immediate vicinity would be altered or obstructed?

Views may be altered as the location and height of proposed transmission poles differs from the existing distribution poles. However, no significant adverse aesthetic impacts will occur.

c. Proposed measures to reduce or control aesthetic impacts:

The proposed transmission poles will be framed using 'trimline' construction, which results in the lowest and most aesthetically pleasing profile. No other measures to reduce aesthetic impacts are required or proposed.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The proposed project will not produce any light or glare.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Since the proposed project will produce no light or glare, no safety hazards or view interferences are expected.

c. What existing off-site sources of light or glare may affect your proposal?

No existing off-site sources of light or glare will affect the proposed project.

d. Proposed measures to reduce or control light and glare impacts:

No impacts are anticipated; therefore, no mitigation is proposed.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

The proposed alignment will be within the vicinity of the La Center Bottoms, and the Tri Mountain Golf Course.

b. Would the project displace any existing recreational uses? If so, please describe.

Agency use only

The proposed project will not displace any existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreational opportunities to be provided by the project or applicant:

No impacts will occur; therefore, no measures are proposed.

13. Historic and cultural preservation

a. Are there any places or objects on or near the site which are listed or proposed for national, state, or local preservation registers. If so, please describe.

The Saint Mary of Guadalupe Catholic Church and cemetery are located on NW 11th Avenue, in unincorporated Clark County adjacent to, but not within, the project area. The church building is modern; however, the oldest grave in the cemetery dates to 1860. Cemeteries are considered archaeological sites by the Department of Archaeology and Historic Preservation (DAHP); the WISAARD database allows individuals to inventory these resources on a Cemetery Detail Report form. The Saint Mary of Guadalupe Cemetery is one such resource; it was recorded using the DAHP public reporting system, and was issued as Smithsonian site number by DAHP.

The cemetery has not been evaluated for listing in the National Register of Historic Places (NRHP). There are no places, objects, or sites in the project area that are listed or eligible for national, state, or local preservation registers.

b. Please describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

In June of 2017, Archaeological Investigations Northwest, Inc. (AINW), prepared an archaeological predetermination report titled "Clark County, City of Ridgefield, City of La Center Archaeological Predetermination Report" for this project. During the study, a historic-period glass insulator was found during shovel testing and was recorded as an archaeological isolate.

In 1986, a biface was reportedly found 820 feet east of the northern part of the project area, but it was not recorded on a State of Washington Archaeological Site Inventory Form. . As mentioned above, the Saint Mary of Guadalupe cemetery is an unevaluated archaeological site that is adjacent to the project area.

c. Proposed measures to reduce or control impacts:

Shovel testing in the road right-of-way along NW 11th Avenue and immediately adjacent to Saint Mary of Guadalupe Catholic Church cemetery did not encounter archeological resources or human remains; however, the applicant will implement AINW's recommendation of archaeological

monitoring during ground disturbance at the two utility pole locations adjacent to the cemetery. Archaeological monitoring will help to ensure that burials would not be encountered or disturbed during project construction, as boundaries for early cemeteries are often imprecise.

One archaeological isolate was identified within the project area. An Archaeological Site Alteration and Excavation Permit is not needed for the archaeological isolate. Road construction, agricultural plowing, rural development, and the installation of existing utilities have disturbed most of the project area. No further archaeological work is recommended for the remainder of the project area.

14. Transportation

a. Identify the public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

The proposed project will run adjacent to existing city or county roads, including NE 10th Avenue, NE and NW 279th Street, NW11th Avenue, NW 299th Street, NW Paradise Park Road, NW 31st Avenue, NW 324th Street, and NW 26th Avenue. The project will not require access from these roads excepting during construction and periods of maintenance.

b. Is the site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

There are no public transit facilities within the project area.

c. How many parking spaces would the completed project have? How many would the project eliminate?

The proposed project will not provide or eliminate any parking spaces.

d. Will the proposal require new roads or streets, or improvements to existing roads or streets, not including driveways? If so, please describe and indicate whether it's public or private.

The proposed project will occur adjacent to existing road rights of way and no new roads or improvements will be required.

e. Will the project use water, rail, or air transportation? If so, please describe.

No, the proposed project will not use water, rail, or air transportation.

f. How many vehicular trips per day would be generated by the completed project? Indicate when peak traffic volumes would occur.

Agency use only

The proposed project will generate only minimal traffic, which will be related to periodic maintenance and inspections.

g. Proposed measures to reduce or control transportation impacts:

No impacts are anticipated; therefore, no measures are proposed.

15. Public services

a. Would the project result in an increased need for public services (e.g., fire protection, police protection, health care, schools, other)? If so, please describe.

No, the proposed project will not increase the need for public services.

b. Proposed measures to reduce or control direct impacts on public services:

No impacts are anticipated; therefore, no measures are proposed.

16. Utilities

a. Circle the utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

The project site consists of an overhead utility corridor through all three jurisdictions, with a portion of the La Center alignment occurring underground. Utilities which follow the proposed overhead alignment includes existing CPU distribution lines, and franchise utilities including lines from CenturyLink, Comcast, and Sawtooth Technologies (fiber). The proposed project will require no utility service. The project is a transmission line that will provide electrical service.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on or near the site:

The proposed project will not require any utility services; it will provide electrical service upon completion. However, as a component of the project, franchise utilities that are currently located on the existing distribution poles that are subject for removal will be relocated onto the proposed transmission poles. The utility purveyors which will need to relocate their equipment onto the transmission poles include CenturyLink, Comcast, and Sawtooth Technologies.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: David Tate Date Submitted: 4-26-18