

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** TRIP 3 Lot 12 Property Disposal

**Project No.:** LURR20190076

**Project Manager:** Mark Korsness – TEP-TPP-1

**Location:** Multnomah County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.24 Property Transfers

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) proposes to sell fee-owned property, commonly known as Lot 12 to Troutdale Grid LLC, a Delaware limited liability company (Buyer). Lot 12 is currently undeveloped and located in the Troutdale Reynolds Industrial Park No. 3 (TRIP 3).

Buyer would purchase the lot for potential future energy development activities. It is expected that Buyer would comply with all applicable laws and regulations for any future lot development.

**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/ Nancy A. Wittpenn

Nancy A. Wittpenn  
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange                      12/10/2021

Katey C. Grange                      Date

NEPA Compliance Officer

Attachment(s): Environmental Checklist

# Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** TRIP 3 Lot 12 Property Disposal

## **Project Site Description**

Lot 12 is a flat, irregularly-shaped parcel (about 40 acres), zoned for industrial use, in east Multnomah County, about 2 miles northwest of Troutdale. The lot, undeveloped former agricultural land, contains a mix of emergent herbaceous vegetation, including wetlands (11 acres), grasses, and noxious weeds. The western boundary is adjacent Port of Portland property that is vacant and also contains similar vegetation but no wetlands. The eastern boundary is also adjacent to Port property that contains wetlands. The Columbia River berm forms the northern boundary of Lot 12, creating a barrier to the river to the north. The berm also prevents Lot 12 from being in the floodplain.

As land adjacent to a former aluminum plant and then subjected to Troutdale sewage treatment sludge disposal, the site was listed as a Superfund site under CERCLA in 1994. A contaminated groundwater plume remains under the property. Polycyclic aromatic hydrocarbons present in the soil in Lot 12 and in the surrounding area exceed risk-based concentrations for residential exposure, but are within industrial land use limits.

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

### **1. Historic and Cultural Resources**

Potential for Significance: No

Explanation: No impacts to historic resources are expected from the disposal of the property. A BPA archaeologist reviewed a 2016 cultural resource report prepared for BPA by Archaeological Investigations Northwest that included a thorough exploration of Lot 12. While a historic scatter was identified nearby, the archaeologist concluded that this project has no potential to affect historic properties.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: No disturbance to soils, nor impacts to geology are expected from the disposal of the property. It is assumed that any future development of the lot would be done in accordance with the site's development standards and local and state stormwater and erosion control requirements to limit soil erosion.

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

Potential for Significance: No

Explanation: Lot 12 generally contains low-to-moderate quality herbaceous vegetation, which would not be disturbed for the sale. No Federal (Endangered Species Act (ESA)-listed) or state special-status species or habitats were identified during surveys of Lot 12 and adjacent lots.

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

Potential for Significance: No

Explanation: No Federal (ESA-listed) or state special-status species or habitats were identified during surveys of Lot 12 and adjacent lots. The lot is located within an industrial park with limited wildlife habitat. Any future development could cause disturbance consistent with other industrial land use development in the area.

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

Potential for Significance: No

Explanation: No standing water bodies, floodplains, or fish occur on Lot 12.

### **6. Wetlands**

Potential for Significance: No

Explanation: Although 11 acres of primarily emergent wetlands occur on Lot 12, no impacts to wetlands would occur from the disposal of the property. It is assumed that the purchaser of the lot would obtain relevant Clean Water Act permits for any future wetland development.

### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Lot 12 is within the Troutdale Reynolds Superfund Site but the disposal of Lot 12 would not create any disturbance to groundwater. Any future development of the lot would be done in accordance with the site-wide Institutional Controls established and approved by the EPA and Oregon DEQ in 2006 per requirements of CERCLA and would not contribute to further groundwater contamination.

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

Potential for Significance: No

Explanation: Disposal of Lot 12 would not change or alter the designated land use. Any future development on this lot would be consistent with its industrial land use designation.

### **9. Visual Quality**

Potential for Significance: No

Explanation: Disposal of Lot 12 would not change or alter the visual quality of the surrounding area.

## 10. Air Quality

Potential for Significance: No

Explanation: Disposal of Lot 12 would not affect air quality.

## 11. Noise

Potential for Significance: No

Explanation: Disposal of Lot 12 would not affect noise levels in the surrounding area. Any noise generated from any future development would be consistent with other industrial activities occurring generally in the area and consistent with industrial land use zoning.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Disposal of Lot 12 would not affect 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: N/A

**Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.**

Explanation: N/A

**Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.**

Explanation: Lot 12 is subject to site-wide Institutional Controls established and approved by the EPA and Oregon DEQ in 2006 per requirements of CERCLA. The Institutional Controls include a Contaminated Media Management Plan that applies to ground disturbing activities that involve soil and groundwater. Upon transfer of fee ownership of Lot 12 to Buyer, among other items, BPA would include the binding covenants, conditions, and restrictions outlined in its 2017 purchase and sales agreement.

**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**

Description: The surrounding landowners are aware of BPA's intent to dispose of Lot 12.

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

Signed: /s/ Nancy A. Wittpenn 12/10/2021  
Nancy A. Wittpenn, ECT-4 Date