

135 FERC ¶ 62,105  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

PacifiCorp

Project No. 2342-024

ORDER APPROVING ROAD IMPACT ASSESSMENT PLAN

(Issued May 04, 2011)

1. On March 15, 2011, and supplemented on May 3, 2011, PacifiCorp (licensee) filed a Road Impact Assessment Plan (Plan) pursuant to ordering paragraph (E)(7) of the Order Accepting Surrender of License, Authorizing Removal of Project Facilities, and Dismissing Application for New License (Surrender Order) for the Condit Hydroelectric Project No. 2342.<sup>1</sup> The project is located on the White Salmon River in Klickitat and Skamania counties, Washington.

**Background**

2. Ordering paragraph (E)(7) of the Commission's Surrender Order, requires the licensee as part of the project removal plan to file for approval, at least 90 days before starting removal activities, a road impact assessment for Klickitat County roads used during project removal to ascertain the extent of road design issues and probable damage to the roads, and to mitigate those impacts, due to project removal activities. Ordering paragraph (H) of the Commission's Order on Rehearing, Denying Stay, and Dismissing Extension of Time Request (Rehearing Order) clarifies that the licensee is required to consult with Klickitat County in preparing the Road Impact Assessment Plan.<sup>2</sup>

**Licensee's Plan**

3. Under the March 15, 2011 Road Impact Assessment Plan, as supplemented May 3, 2011, the licensee proposes to perform a baseline visual assessment, a supplemental assessment, and a post-removal assessment for Powerhouse Road, Graves Road, and Northwestern Lake Roads. The results of the assessments will be used to consider whether mitigative measures to prevent or minimize roadway damage may be appropriate.

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<sup>1</sup> *PacifiCorp*, 133 FERC ¶ 61,232 (2010).

<sup>2</sup> *PacifiCorp*, 135 FERC ¶ 61,064 (2011).

4. The licensee proposes to perform a baseline pavement/roadway assessment in early June 2011, which will be in compliance with the 1999 Pavement Surface Condition Field Rating Manual for Asphalt Pavements, prepared by the Northwest Pavement Management Association and the Washington State Department of Transportation. The licensee will walk the roadways, perform a continuous survey, and document observations of roadway surface conditions. The observations will be photographed, and information will be keyed to station locations on a roadway map and described in a data table. Copies of the three assessments will be provided to the Commission and Klickitat County.

5. The licensee proposes a supplemental assessment after the contractor completes significant decommissioning activities to evaluate whether the increased loading may have a negative impact on the roadway pavements or traffic-bearing surfaces, resulting in risks of reduced surface life, pavement distress, or premature failure. The following will be incorporated in the supplemental assessment: identification of project activities and the proposed affected roads; and a geotechnical investigation that discusses site geology, climatological and terrain conditions, non-destructive testing of Powerhouse and Graves Roads, subsurface investigation, laboratory testing of soils, pavement analysis, calculation of estimated traffic loading, and estimates of pavement life based on estimates of project use.

6. Upon completing significant decommissioning activities, the licensee will perform a follow-up pavement survey of Powerhouse and Graves Roads in August 2012, to determine the amount, if any, of roadway impact related to removal-related construction traffic to these roads. The same visual field survey approach will be used in the post-removal assessment. The licensee will consult with Klickitat County and implement any necessary corrective actions.

### **Pre-Filing Consultation**

7. On February 11, 2011, the licensee distributed a draft copy of the Road Impact Assessment Plan to Klickitat County via email. Comments on the draft plan were provided by Klickitat County on February 14, 2011, and March 11, 2011. Klickitat County comments that developers pursuing a road haul agreement in the County are required to evaluate the structural strength of the road using a specific methodology, and therefore, the licensee should incorporate the methodology in the assessments. In addition, Klickitat County states that the removal of the project will use two county roads as haul routes, and these roads have minimal base to support traffic and a thin bituminous surface treatment wearing surface, thus the roads will need to be evaluated per the geotechnical guidelines provided by Klickitat County. Klickitat County also states that if mitigation is necessary to support the construction activities, it should be done in advance of the hauling operation. Finally, Klickitat County points out that Graves Road is not

wide enough for two vehicles to pass and therefore, if the road is used for hauling activities, it will be necessary to construct turn-outs at appropriate locations to maintain public safety. The licensee appropriately addresses Klickitat County's comments in the Plan.

### **Review**

8. We reviewed the licensee's filed Road Impact Assessment Plan and it satisfies the requirements of ordering paragraph (E)(7) of the Order Accepting Surrender of License, Authorizing Removal of Project Facilities, and Dismissing Application for New License. The Plan provides for an adequate assessment of the impact that the decommissioning of the Condit Hydroelectric Project has on the Klickitat County roads. The licensee proposes to perform a baseline study to which any impacts will be compared. The licensee also states it will mitigate the impacts caused by project removal activities. Additionally, the licensee has adequately addressed all concerns raised by Klickitat County during the consultation process. The Road Impact Assessment Plan should therefore be approved.

### **The Director orders:**

(A) PacifiCorp's Road Impact Assessment Plan filed on March 15, 2011, and supplemented on May 3, 2011, pursuant to ordering paragraph (E)(7) of the Commission's Order Accepting Surrender of License, Authorizing Removal of Project Facilities, and Dismissing Application for New License of the Condit Hydroelectric Project is approved.

(B) This order constitutes final agency action. Any party may file a request for rehearing of this order within 30 days from the date of its issuance, as provided in section 313(a) of the FPA, 16 U.S.C. § 8251 (2006), and the Commission's regulations at 18 C.F.R. § 385.713 (2010). The filing of a request for rehearing does not operate as a stay of the effective date of this order, or of any other date specified in this order. The licensee's failure to file a request for rehearing shall constitute acceptance of this order.

William Guey-Lee  
Chief, Engineering Resources Branch  
Division of Hydropower Administration  
and Compliance