

memorandum

DATE: March 28, 2012

REPLY TO
ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Monica Stafflund
Realty Specialist – TERR-Chemawa

Proposed Action: Portland General Electric (PGE) 13-kilovolt (kV) Overhead Electrical Line Land Use Review Request (LURR)

Budget Information: 00184006, Task 01

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

Location: Township 7 south, Range 3 West, Section 17, Polk County, Oregon

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA proposes to allow PGE a 1-mile long, 20-foot wide easement on BPA fee-owned property for the purpose of constructing a new 13-kV power line parallel to BPA's existing Chemawa-Salem transmission line in Polk County, Oregon. Construction disturbance would include placement of approximately 20 wood pole structures on BPA's east property line. Expected ground disturbance at each pole site would include the use of an auger to drill a hole suitable for pole placement. Once the poles are positioned, offset soil would be used to backfill and stabilize the structure. A crane would be used to position the conductors to the required height, insulators and other needed equipment would also be installed on the wood pole structure. Finally, conductors would be connected to the insulators. No new access roads, trenching, or staging areas would be needed on BPA property to complete this project. All work would occur in an area that has been previously disturbed from transmission line construction, grazing activity, and seasonal mowing and clearing.

Based on a site survey and a detailed cultural resource report produced by BPA contract archaeologists covering the proposed area of potential effect, it was determined that no adverse effects to cultural resources would occur from this project. The cultural resource report and a summary letter were sent on September 1, 2011 to the Oregon State Historic Preservation Office (SHPO), The Confederated Tribes of Grand Ronde, and the Confederated Tribes of the Siletz. A concurrence letter dated September 7, 2011 was received from the SHPO regarding this cultural resource report. No response was received from the tribes.

In January 2012 BPA initiated informal consultation with the US Fish and Wildlife Service (USFWS) regarding potential presence of Endangered Species Act (ESA)-listed species and/or their habitat. Turnstone Environmental Consultants prepared a Biological Assessment (BA) that addressed the following ESA-listed Willamette Valley Prairie species:

- Fender's blue butterfly (*Icaricia icarioides fenderi*), Endangered
- Willamette daisy (*Erigeron decumbens* var. *decumbens*), Endangered
- Bradshaw's lomatium (*Lomatium bradshawii*), Endangered
- Kincaid's lupine (*Lupinus sulphureus* spp. *Kincaidii*), Threatened
- Nelson's checker-mallow (*Sidalcea nelsoniana*), Threatened

On February 27, 2012, USFWS concurred with BPA's determination that the project may affect, but is not likely to adversely affect the above mentioned species. BPA and USFWS identified a list of provisions to specify avoidance and minimization measures to be taken before, during, and after project construction takes place.

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.

Based on the provisions identified on the attachment, 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/ Claire McClory
Claire McClory – KEC-4
Environmental Project Manager

Concur:

/s/ Katherine S. Pierce
Katherine S. Pierce
NEPA Compliance Officer

Date: March 28, 2012

Attachments:
Provisions
Environmental Checklist for Categorical Exclusions

Provisions

This categorical exclusion will meet the following provisions:

Should archaeological materials be unexpectedly encountered during project activities, the following actions should be taken:

- Stop work and immediately notify the COTR or site manager and a qualified archaeologist. In addition, all concerned Tribes and appropriate federal, state, and local agencies should be notified.
- Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
- Take reasonable steps to restrict access to the site of discovery.
- Take reasonable steps to ensure the confidentiality of the discovery site.

Prior to construction of the line, a qualified biologist will survey the project area for ESA-listed species. The following adaptive management procedures would be implemented if any individuals or clusters of Kincaid's lupine, Nelson's checker-mallow, Bradshaw's lomatium, or Willamette daisy are observed within the construction corridor prior to or during project construction:

- Work in the vicinity of the listed plant(s) would cease immediately and consultation with USFWS must be reinitiated;
- A qualified botanist would verify identity and delineate the extent of the plant(s);
- The US Fish and Wildlife Service (Service) would be notified of the discovery;
- All efforts would be made to avoid disturbance to discovered species, including micro-siting to relocate the access roads where possible to avoid rare plant populations. If disturbance to the plant cannot be avoided, the Project would minimize disturbance to the maximum extent practicable by implementing the following steps:
 - Clearly delineate and fence as much of the rare plant population as possible;
 - Retain a qualified botanist to provide monitoring during construction;
 - Salvage plants and propagules; and,
 - Implement site restoration measures immediately upon completion of any work in the vicinity of rare plants.

Environmental Checklist for Categorical Exclusions

Name of Proposed Project: PGE 13-KV Overhead Electric Line LURR

Work Order #: 00187006, Task 01

This project has been found to **not** adversely affect the following environmentally sensitive resources, laws, and regulations:

Environmental Resources	No Adverse Effect	No Adverse Effect With Conditions
1. Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. T & E Species, or their habitat(s) Adaptive management procedures identified in the CX provisions would be implemented if any individuals or clusters of Kincaid's lupine, Nelson's checker-mallow, or Willamette daisy are observed within the construction corridor during project construction.	<input type="checkbox"/>	<input checked="" 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 agricultural lands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Consistency with state and local laws and regulations	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Pollution control at Federal facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed: /s/ Claire McClory

Date: March 28, 2012