

# memorandum

DATE: June 5, 2013

REPLY TO  
ATTN OF: KEPR-4

SUBJECT: Environmental Clearance Memorandum

TO: Chad Hamel  
Project Manager – TEP- TPP- 1

**Proposed Action:** De-energized Wood Pole Removal Project

**PP&A Project No.:** 2601

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.10 Removal of electric transmission facilities

**Location:** Multnomah and Washington counties, OR

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposed Action:** BPA proposes to remove two de-energized transmission lines that are located within the Portland Metro area. The entire remaining length of the Keeler-Pennwalt transmission line, from Keeler Substation to Structure 9/6, would be removed (approximately nine miles). Approximately three miles of the St. John's Tap to Keeler-Oregon City line, from structure 3/1 to structure 5/12, would also be removed. A total of 109 wood pole structures, conductor, and associated hardware would be removed and disposed of as part of this project. Predominant land uses along the subject corridor include suburban residential and park lands managed by Tualatin Hills Parks and Recreation and City of Portland Parks and Recreation.

To perform the work, first the conductor and pole-mounted hardware must be disconnected and removed. Then the wood poles would be removed. At structure sites that can be accessed by heavy equipment, such as a boom truck, individual poles would be pulled directly out of the ground. The removed poles would be placed on a pole truck (log truck) by the boom truck, or temporarily placed on the ground near the work area and picked up by a self-loading pole truck. At structure sites that cannot be accessed by heavy equipment, or where the condition of the pole is a safety concern, individual poles would be felled onto the ROW, cut into smaller pieces, and removed from the ROW. The remaining butt section would be cut off between 0 and 2 feet below the ground surface. At all locations, holes would be backfilled with clean imported material, and appropriate erosion and sediment controls would be installed at any disturbed areas.

**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/ Oden Jahn

Oden Jahn  
Physical Scientist (Environmental)

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

DATE: June 5, 2013

Attachments:  
Provisions  
Environmental Checklist for Categorical Exclusions

## ATTACHMENT

### PROVISIONS

The following project conditions and conservation measures would be implemented for this project:

1. Vehicles or construction equipment are not allowed off of access roads and structure sites, or staging areas.
2. Sediments or fuels and other fluids from accidental spills are not allowed to enter into any waterbody or conveyance, including ditches, streams, and wetlands.
3. Erosion and sediment control devices must be installed according to manufacturer instructions or Western Washington Stormwater Manual, prior to ground disturbing activities, and in such a manner as to insure that sediment and sediment laden water do not enter waterbodies or wetlands, or violate applicable water standards.
4. Construction activity in any water body or wetland is not allowed, except when applicable permits have been issued.
5. All equipment fueling operations shall utilize pumps and funnels and absorbent pads. Engine, transmission, and hydraulic oil may be added as needed utilizing funnels and drip pans. No vehicle maintenance other than emergency repair should be performed on the project site.
6. Place drip pans and absorbent pads under all leaking construction equipment to prevent fluid contact with ground or soil surface.
7. Spill containment and cleanup materials shall be readily available in construction equipment, staging areas, and at work sites. Any spill response materials used shall be replaced within 24 hours.
8. Seed/mulch/fertilize all lightly disturbed areas with regionally appropriate erosion control seed mix or as specified by the landowner.
9. All treated wood, including cuttings, must be handled and disposed of according to all applicable state and federal regulations.
10. At the site of Keeler-Pennwalt Structure 3/9 work must take place under the observation of cultural and tribal monitors. Further, no digging is allowed at this site.
11. Additional conditions (i.e. revegetation, access points, traffic control, fire prevention, etc.) are required by Portland Parks and Recreation, when working within Forest Park.

## Environmental Checklist for Categorical Exclusions

Name of Proposed Project: De-energized Wood Pole Removal Project

Work Order #: 318897, 318901

**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 Avoidance and minimization measures, as agreed upon between BPA and the Oregon SHPO, would be implemented at one structure site that is near a recorded cultural site. BPA has determined that by implementing these measures the project would result in no adverse effect to historic properties. Project activities that may cause ground disturbance would not begin until Section 106 consultation has concluded. These activities may include: operating line equipment and heavy machinery within the ROW or along access roads; clearing within the ROW or along access roads; access road improvements; removal of conductor and hardware; deconstruction of structures; and removal of poles.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. T & E Species, or their habitat(s) It was determined that known populations of marbled murrelet, Willamette daisy, water howellia, Fender's blue butterfly, Bradshaw's desert parsley, Kincaid's lupine, Steelhead, Columbian white-tailed deer, bull trout, Nelson's checker-mallow, and northern spotted owl do occur near the project area. The project area does not provide the required habitat conditions for the above-mentioned species. Implementing the project conditions and conservations measures would further reduce potential impacts to these species. It was also determined that the project area is located several miles from the nearest marbled murrelet, Willamette daisy, Fender's blue butterfly, Kincaid's lupine, steelhead, bull trout, and northern spotted owl critical habitat. For the above reasons, it was determined that this project would have "No Effect" on these listed species or critical habitat.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Floodplains or wetlands None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Areas of special designation The project crosses park lands managed by Tualatin Hills Parks and Recreation and Portland Parks and Recreation. An agreement between BPA and Portland Parks and Recreation prescribes requirements and conditions for work within Forest Park.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Health & safety None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Prime or unique farmlands None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other (describe) None.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed /s/ Oden Jahn

Date May 30, 2013

Oden Jahn KEPR-4