Proposed Action: Keeler-Oregon City No. 2 Str. 6/10 Structure Modification

PP&A No.: 3979

Project Manager: Hall, Sara

Location: Washington County, OR

<table>
<thead>
<tr>
<th>Line Section</th>
<th>Township</th>
<th>Range</th>
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<td>Keeler-Oregon City No. 2</td>
<td>01N</td>
<td>01W</td>
<td>29</td>
<td>WASHINGTON</td>
<td>OR</td>
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Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.6 Additions and modifications to transmission facilities.

Description of the Proposed Action: BPA is proposing to remove three existing guy wires and install steel cross braces on the Keeler-Oregon City No. 2 (KEEL-OREC-2) 115-kV line Structure 6/10 in Washington County, Oregon.

This request is in support of Tualatin Hills Parks and Recreation District’s (THPRD) Westside Trail expansion project to construct a new asphalt pedestrian pathway in the KEEL-OREC-2 transmission line rights-of-way (reviewed in a previous categorical exclusion “Tualatin Hills Park and Recreation District Westside Trail Segment 18 Project”, April 7, 2015). Currently, guy wires from KEEL-OREC-2 Str. 6/10 would be located in the center of the proposed pathway which would be hazardous to future users.

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, July 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/ Kevin George  
Kevin George  
Environmental Protection Specialist

Concur:

/s/ Stacy L. Mason  
Stacy L. Mason  
Date: July 23, 2018  
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.

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Project Site Description

The proposed project takes place in the BPA fee owned KEEL-OREC-2 115-kV transmission line rights-of-way at structure 6/10, the structure landing, and adjacent access road. The work area is adjacent to the Oak Hills residential development and on a rise above the wetland complex associated with Bronson Creek. Vegetation in the work area is dominated by native and non-native grasses and low growing shrubs. THPRD’s Westside Trail Segment 18 Project was reviewed by BPA in April 2015, a Categorical Exclusion issued, and Land Use Agreement developed with BPA.

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
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<tr>
<td>1. Historic and Cultural Resources</td>
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<td><img src="https://example.com/check.png" alt="check" /></td>
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**Explanation:** A cultural resources review was conducted by Bonneville Power Administration on June 7, 2018. Consultation was initiated with the Confederated Tribes of Grand Ronde (CTGR), the Confederated Tribes of Siletz Indians of Oregon, and the Oregon State Historic Preservation Office (SHPO), no comments were received from the CTGR or the Confederated Tribes of Siletz Indians of Oregon. After changes in activities and further review of the project, BPA has determined that this type of activity will have no adverse effect on historic properties, per 36 CFR 800.5 (b). The project is not located in any known archaeological sites.

| 2. Geology and Soils          | ![check](https://example.com/check.png) | ![check](https://example.com/check.png) |

**Explanation:** The project would cause minimal soil disturbance. Erosion control Best Management Practices (BMPs) would be used to stabilize soil during and after construction.

| 3. Plants (including federal/state special-status species) | ![check](https://example.com/check.png) | ![check](https://example.com/check.png) |

**Explanation:** It was determined that known populations of Willamette daisy, water howellia, Bradshaw’s desert parsley, Kincaid’s lupine, golden paintbrush, and Nelson’s checker-mallow occur in the county, the project area does not provide the required habitat conditions for the above-mentioned species. In addition, it was determined the project area is located several miles from the nearest Willamette daisy and Kincaid’s lupine occurrence. Anchor rods will be cut off 18 inches to 20 inches below grade. Surface impacts may be up to 24 inches in diameter. With the exception of the one anchor rod being cutoff within the new trail alignment, at each anchor site, topsoil’s to include any plants and roots will be removed intact and replaced in the same order as they were removed. Any other disturbed soils will be reseeded with an appropriate hydrologically and regionally appropriate native seed mix. For the above reasons, it was determined that this project would have “No-Effect” on these listed species or critical habitat.
4. **Wildlife** (including federal/state special-status species and habitats)

**Explanation:** No known federal/special-status wildlife is present within the project area.

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

**Explanation:** There are no federal/state special status species, water bodies, or flood plains found within the project area.

6. **Wetlands**

**Explanation:** The project area is located on a rise adjacent to a freshwater emergent wetland associated with Bronson Creek. Soil disturbances would take place during the regional dry season, seasonally appropriate erosion control Best Management Practices would be utilized. Total soil disturbance at the three anchor sites is not anticipated to exceed 10 square feet.

7. **Groundwater and Aquifers**

**Explanation:** No new wells or use of ground water is proposed. The maximum depth of disturbance will be about 2 feet. Spill prevention measures will be present to prevent any inadvertent contamination.

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

**Explanation:** The work is on existing right-of-way and access roads and will not impact land use.

9. **Visual Quality**

**Explanation:** Addition of cross braces will appear similar in appearance as the existing cross braces on the adjacent OREC-STUB-C Str. 7/10. Guy wires would be removed from the existing KEEL-OREC-2 Str. 6/10. These changes would not negatively alter or effect visual quality.

10. **Air Quality**

**Explanation:** Any fugitive dust or vehicle emissions generated during project implementation would be temporary and negligible. Water and other BMPs would be used to minimize fugitive dust and sediment erosion at the project site as needed.

11. **Noise**

**Explanation:** Construction noise would be temporary and localized during daylight hours.

12. **Human Health and Safety**

**Explanation:** Proposed action is on existing right-of-way and access roads and will not adversely impact human health or 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, if necessary:

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

Explanation, if necessary:

☑ 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, if necessary:

☑ 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, if necessary:

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**Landowner Notification, Involvement, or Coordination**

**Description:** This project takes place on BPA fee owned land. THPRD has a Land Use Agreement with BPA under which BPA shall modify and add structural supports to accommodate THPRD’s trail construction.

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

Signed: /s/ Kevin George  
Kevin George  
Environmental Protection Specialist  
Date: July 23, 2018