**Proposed Action:** Green Peter-Lebanon No. 1 Line Access Road Maintenance Project from 1/5 to 12/3, Redmond District

**Project No.:** 395552

**Project Manager:** Donna Martin – TELF-TPP-3

**Location:** Linn County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine maintenance

**Description of the Proposed Action:** BPA proposes to repair and improve approximately 3.4 miles of access road along the Green Peter-Lebanon No. 1 transmission line from structure 1/5 to 12/3. Proposed road work would include; blading, shaping, grading, brushing, mowing, and placing surface rock on new and existing road prisms to ensure safe access to structures. In addition, the proposed road work would include: the construction of 5 tower landings covering approximately 0.27 acres in total, the replacement of 3 cross-drain culverts, and installation of drainage features such as water bars and drain dips. General equipment used for this type of road maintenance includes: graders, rollers, bulldozers, brush hogs, excavators, and dump trucks.

The road maintenance activities are proposed to be conducted during the 2019-2020 construction season but may be extended into 2021. If prior to or during construction activities the proposed action may result in adverse impacts to resources that are not described within this categorical exclusion, coordination with the appropriate agencies and a reevaluation of effects may be warranted.

**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/ Laura Roberts  
Laura Roberts EPI-4

Concur:

/s/ Sarah T. Biegel  
Date: December 14, 2018  
Sarah T. Biegel  
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: Green Peter-Lebanon No. 1 Line Access Road Maintenance Project from structures 1/5 to 12/3

Project Site Description

A site evaluation was conducted by Otak, Inc. and Pacific Habitat Services, Inc. biologists on June 28 and 29, August 24 and 30, 2016, and Otak Inc. conducted an additional site evaluation for the proposed new route additions on November 20, 2018. The proposed project spans approximately 10 miles between the City of Lebanon to the Green Peter Dam (east of the City of Sweet Home), in rural Linn County, OR. Land ownership within the project area is privately held. Land use within the project vicinity includes primarily large tracts of privately managed forested lands for timber production, as well as some agriculture and cattle grazing on privately held lands on the western end of the line. The approximate site elevation is between 350 and 2,300 feet above sea level. The project area is located in dense coniferous forest habitat typical of the region, managed timber areas, as well as agricultural fields.

Evaluation of Potential Impacts to Environmental Resources

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<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
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<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
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Explanation:
An archaeologist from Archaeological Investigations Northwest, Inc. (AINW), conducted a cultural resource survey for the Green Peter-Lebanon No.1 Transmission Line and Access Road operated and maintained by BPA. The AINW archaeologist conducted the archaeological pedestrian survey between June 20 and 23, 2016. The background research found no evidence of Traditional Cultural Properties. BPA submitted a determination of “No Historic Properties Affected” on September 9, 2016, to the Confederated Tribes of the Grand Ronde, the Confederated Tribes of Siletz, the Oregon State Historic Preservation Office, and the U.S. Army Corps of Engineers. On September 28, 2016, we received concurrence with this determination from OR SHPO. No other comments were received.

2. Geology and Soils

Explanation:
The project would impact approximately 0.23 acres of soils designated as Prime and Unique Farmland by the U.S. Department of Agriculture near towers 18/3 and 19/2, where landings at each location are proposed. At tower 18/3, the project proposes construction of two new 50’x50’ landings (5,000 sq. ft. total) in soils identified as Newberg Fine Sandy Loam, which carries the USDA Prime and Unique Farmland designation under irrigated conditions. It is unclear whether these existing fields are irrigated every year, though irrigation does seem to occur in some years as evident in aerial photos. At tower 19/2, the project proposes construction of two new 50’x50’ landings (5,000 sq. ft. total) in soils identified as Coburg Silty Clay Loam, which carries the USDA Prime and Unique Farmland designation under all irrigated or non-irrigated conditions.
conditions. The landings described above are designed to be permanent; therefore, approximately 0.11 acres of Prime and Unique Farmland designation under irrigated conditions and 0.11 acres of Prime and Unique Farmland designation under all conditions would be permanently impacted. The proposed landings are designed at the minimum practicable size to avoid and minimize impacts to the fields and would not significantly diminish the availability of Prime and Unique Farmlands in the vicinity.

3. **Plants** (including federal/state special-status species)  

**Explanation:**  
The proposed project occurs in rural Linn County, OR, in the western Cascade foothills of the Willamette Valley. Western hemlock (*Tsuga heterophylla*), Douglas-fir (*Pseudotsuga heterophylla*), and bentgrass (*Agrostis capillaris*) are dominant in this widespread plant community type typical of the region. Sparse vegetation has established within the roadway in some areas and would be cleared from the road prism where roadwork is proposed. No mature trees are proposed for removal, though saplings growing within the right of way area proposed for roadside vegetation clearing may be removed. Several federally-listed or proposed listed plant species under jurisdiction of the USFWS are documented to occur or have the potential to occur in the region; however, no suitable habitat for special-status plant species was found to occur within the project area. No special-status plant species or their habitats were documented to occur within the vicinity or were observed during the field surveys due to lack of suitable habitat. A Letter of No Effect has been completed to document compliance with the Endangered Species Act (ESA) and has been submitted under separate cover to BPA. Therefore, the proposed action would have no effect on special-status plant species and limited impacts to native vegetation communities.

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

**Explanation:**  
An official federally-listed species list was requested from the U.S. Fish and Wildlife Service Information, Planning and Conservation database (IPaC) on November 27, 2018 (updated). Several federally-listed or proposed listed wildlife species under jurisdiction of the USFWS are documented to occur or have the potential to occur in the region; however, no suitable habitat for special-status wildlife species was found to occur within the project area. The proposed project actions would mainly occur within the existing road prism and any impacts to non-listed wildlife species would be temporary in nature and limited to construction within the road prism and existing right of way. See the ESA Letter of No Effect for this project for further details. Therefore, the project would have no impacts to federally-listed wildlife and limited impacts to other wildlife species.

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

**Explanation:**  
The project area is located within the South Santiam Watershed. A number of permanent waterbodies are present within the project vicinity; however, no in-water work is proposed within these waterbodies. One ephemeral drainage is present within the work area. However, work within the drainage would occur when no water was present. Two federally-listed aquatic species under NMFS’ jurisdiction are documented to occur or have the potential to occur in the South Santiam Watershed; however, no suitable habitat for special-status aquatic species was found to occur within the project area. The project area is not within range of any designated critical habitat under NMFS’ jurisdiction. See the ESA Letter of No Effect for this project for further details. Therefore, the project would have no effect to waterbodies,
floodplains, or fish.

6. **Wetlands**[✓]

Explanation:
Permits from the Corps and OR DSL are not needed for compliance with Section 404 of the CWA and the Oregon Removal-Fill Law, respectively, to complete the proposed maintenance activities on the Green Peter-Lebanon No. 1 transmission line. The proposed crossdrains would be replaced in-kind, and discharge of fill material in wetlands occurring within the roadway necessary to maintain use of the access road (e.g., serviceable structure/road) is an exempt activity. No drainage structure or damaged part would be widened by no more than 20 percent of its original footprint. The proposed actions would not adversely impact adjacent wetlands as drainage patterns and hydrological connectivity would be maintained. The proposed activities in the wetlands within the project area are therefore exempt from DSL and USACE regulations.

The proposed new access roads and landings would not result in new wetland fill. Therefore, the proposed action would have limited impacts to wetlands.

7. **Groundwater and Aquifers**[✓]

Explanation:
Groundwater and aquifers would not be impacted by the proposed project as the project does not include any groundwater withdraws or aquifer recharge areas. The proposed work is limited to shallow soils and previously disturbed areas. There would be no impacts to groundwater or aquifers.

8. **Land Use and Specially Designated Areas**[✓]

Explanation:
No change in land use is proposed as part of the project. No specially designated areas were identified within the project limits. The project would not result in changes or impacts to land use or specially designated areas.

9. **Visual Quality**[✓]

Explanation:
There are limited residences within visual range of the work limits. The proposed project feature is consistent with existing roads. There would be no additional impacts to visual resources.

10. **Air Quality**[✓]

Explanation:
The proposed project is expected to reduce dust generation and improve air quality along the access road by covering exposed dirt roads with a gravel surface layer. Minor vehicle emissions during construction would be temporary in duration; therefore, impacts to air quality would be localized, minor, and limited in duration to construction.

11. **Noise**[✓]

Explanation:
Noise generated from construction is expected to be localized and temporary in nature. Construction is
expected to last less than 8 weeks. The current level of road use is not expected to change, and no operational noise increases are expected.

12. **Human Health and Safety**

**Explanation:**
The project would develop a site-specific health and safety plan to address any hazards during the proposed work. The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line and to maintain power delivery in the region. Project activities would not 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**

All activities would be coordinated with landowners prior to beginning work.
Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Laura Roberts
Laura Roberts,
Biological Scientist, EPI-4

Date: December 14, 2018