DATE: September 19, 2014

REPLY TO ATTN OF: KEPR-4

SUBJECT: Environmental Clearance Memorandum

to: Steven Narolski,
Project Manager – TFBV-DOB-1

**Proposed Action:** St Johns-Keeler Minor Access Road Improvement

**PP&A Project No.:** 3050

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

**Location:** Multnomah County, OR

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

**Description of the Proposed Action:** BPA proposes to improve approximately 1,700 feet of road between structure 3/4 and 4/6 of the St Johns-Keeler No. 2 line. Improvements would include mowing and spot rocking with approximately 500 tons of aggregate.

Project work includes mowing and placing three-quarter inch minus rock within the existing road bed. The project would not require any grading or shaping. Heavy equipment needed to conduct work would include backhoe, roller and dump truck. The work is necessary to provide year round access to the transmission system and continued system stability.

**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/ Laura Roberts  
Laura Roberts  
Biological Scientist

Concur:

/s/ Stacy Mason  
Date: September 19, 2014
Stacy Mason  
NEPA Compliance Officer

Attachment:  
Environmental Checklist for Categorical Exclusions
# Environmental Checklist for Categorical Exclusions

**Name of Proposed Project:** St Johns-Keeler Minor Access Road Improvement

**Work Order #:** 00005022

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.

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Potential for Significance</th>
<th>No Potential, with Conditions (describe)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic Properties and Cultural Resources</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Results of a recent cultural survey of the same area (Keeler-Pennwalt transmission line, De-energized Wood Pole Removal Project) identified no cultural resources in the area of the project. Project activities would not cause ground disturbance and BPA has determined that the project would result in no historic properties affected.

| 2. T & E Species, or their habitat(s)                | X                             |                                        |

No endangered species occur within the project area, therefore it was determined that this project would have “No Effect” on these listed species or critical habitat.

| 3. Floodplains or wetlands                          | X                             |                                        |

None.

| 4. Areas of special designation                     |                               | X                                      |

The project crosses park lands managed by Portland Parks and Recreation. An agreement between BPA and Portland Parks and Recreation prescribes requirements and conditions for work within Forest Park.

| 5. Health & safety                                  | X                             |                                        |

None.

| 6. Prime or unique farmlands                        | X                             |                                        |

None.

| 7. Special sources of water                         | X                             |                                        |

None.

| 8. Other (describe)                                 | X                             |                                        |

None.

List supporting documentation attached (if needed):

Signed: /s/ Laura Roberts    Date: September 19, 2014