Bonneville Power Administration

## Bandon-Rogue Transmission Line Rebuild Project

Finding of No Significant Impact

May 2011

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## **Bandon-Rogue Transmission Line Rebuild Project**

## **DEPARTMENT OF ENERGY Bonneville Power Administration**

## Finding of No Significant Impact (FONSI) and Floodplain Statement of Findings DOE EA-1739

<u>Summary</u>: Bonneville Power Administration (BPA) announces its environmental findings on the Bandon-Rogue Transmission Line Rebuild Project (Rebuild Project or Proposed Action). The Rebuild Project involves rebuilding the existing Bandon-Rogue 115-kilovolt (kV) transmission line. The 46-mile-long transmission line is located in Coos and Curry counties in Oregon, extending from the city of Bandon to near Nesika Beach.

BPA has prepared an environmental assessment (EA) evaluating the Proposed Action and a No Action Alternative. Based on the analysis in the EA, BPA has determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act (NEPA) of 1969. Therefore, preparation of an environmental impact statement (EIS) is not required and BPA is issuing this FONSI for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS, and the nature of the Proposed Action is not without precedent.

BPA has prepared a Mitigation Action Plan (MAP) that lists all of the mitigation measures that BPA is committed to implementing. The measures in the MAP reflect the measures identified in the Final EA. The MAP is included as Appendix J of the Final EA.

Comments received on the Preliminary EA and responses to those comments are presented in Chapter 8 of the Final EA. Responses to comments and refinements or changes in the Proposed Action resulted in only minor changes to the Preliminary EA. These changes are underlined (text additions) or struck through (deleted text) in the Final EA.

A Floodplain Statement of Findings is also included in this FONSI. Impacts on floodplains and wetlands will be avoided where possible and minimized where there is no practicable alternative.

<u>Public Availability</u>: This FONSI will be mailed directly to interested parties who requested a copy. A notification of availability will be mailed to other potentially affected parties. For copies of this FONSI and Final EA, please call BPA's toll-free document request line: 1-888-276-7790. The documents are also available at the following website: http://efw.bpa.gov/environmental\_services/Document\_Library/Bandon-Rogue\_Rebuild/.

<u>Additional Information</u>: For additional information about the project, please contact the Project Manager, Erich Orth, toll free at 1-800-282-3713, direct phone number 360-619-6559, or email

etorth@bpa.gov. For additional information about the environmental analysis, please contact the Environmental Document Manager, Kimberly St.Hilaire, toll-free at 1-800-282-3713, direct phone number 503-230-5361, or email at krsthilaire@bpa.gov.

**<u>Proposed Action</u>**: BPA currently owns, operates, and maintains the existing Bandon-Rogue 115-kV transmission line, which is a 46-mile-long transmission line located in Coos and Curry counties, Oregon. The transmission line was originally built in the late 1940s and early 1950s by BPA. BPA needs to take action, because this transmission line is old, physically worn, and structurally unsound in places. The conductor has not been replaced and does not meet current standards. The poor condition of the transmission line creates risks to public and worker safety and could lead to unreliable electrical service.

The Proposed Action is to rebuild the existing 115-kV transmission line in the existing right-ofway, conduct work on some unpaved access roads, and remove some danger trees. The transmission line would continue to operate as a 115-kV line. The proposed schedule is to begin rebuilding the transmission line in June 2011, with some access road work beginning in May 2011. Ongoing stabilization of the work area, monitoring, clean up, and other project-related actions could continue through December, if needed. Details of the Proposed Action are presented in Chapter 2 of the Final EA.

<u>No Action Alternative</u>: The No Action Alternative assumes that BPA would not rebuild the transmission line and would continue to operate and maintain the existing transmission line. Construction activities associated with the Rebuild Project would not occur, and the reliability and safety concerns that prompted the proposal for action would persist.

Because of the deteriorated condition of the existing transmission line, it is likely that more frequent maintenance and more frequent access would be required to maintain it as materials continue to deteriorate and fail over time. Given the poor condition of some of the access roads, it is possible that the access road work proposed under the Rebuild Project would be funded and carried out as a BPA maintenance project in the future, independent of rebuilding the transmission line.

**Environmental Consequences:** To evaluate potential impacts from construction and from operation and maintenance activities, four impact levels were used—high, moderate, low, and no impact. In addition, some impacts have been identified as beneficial. This impact analysis is detailed in Chapter 3 of the Final EA and is summarized below. High impacts are considered to be significant impacts, whereas moderate and low impacts are not. Direct, indirect, and cumulative impacts were evaluated.

The impact evaluation in Chapter 3 of the Final EA includes required mitigation. As mentioned above, a detailed MAP was developed to list the mitigation measures, components, persons responsible, and implementation schedule for each measure. The MAP includes measures to reduce impacts even when those impacts are not considered significant. Mitigation includes actions that were taken during the design phase to avoid or minimize adverse impacts. It also

includes mitigation measures that will be implemented during preconstruction, construction, and post-construction implementation of the Rebuild Project. Some mitigation measures resulted from collaborative consultation and coordination with stakeholders, while others are best management practices that BPA adopts based on past experience maintaining, building, and operating transmission lines.

The following discussion provides a summary of the Proposed Action's potential impacts and the reasons these impacts would not be significant.

Land Use and Recreation: Impacts on land use and recreation would be low, except for low to moderate impacts on residential land uses, as noted below.

- Construction related disturbance of agricultural and grazing lands would be limited and temporary. Less than 1.0 acre of pasture would be converted to access roads.
- Construction impacts within Humbug Mountain State Park would result from replacement of three structures and work on approximately 1,200 feet of access roads. These activities would not result in the direct loss of recreational facilities or lands.
- Removal of 587 danger trees and the conversion of less than 0.5 acre of forested land to access roads would affect a very small percentage of the overall timber base within the study area.
- Access to residential properties could be temporarily delayed by equipment used for construction and maintenance. Because construction would be within the existing right-of-way and along existing access roads, the level of impact would depend on the proximity of homes to construction work sites.
- Traffic delays from increased construction traffic and temporary single-lane closures are not expected to substantially degrade traffic operation or access to recreational facilities because of their short duration.
- Maintenance activities would cause only brief, temporary interruption of residential and recreational use and traffic on local roads and highways.
- Because of the temporary and localized nature of the Proposed Action, except for the construction of less than 1 mile of new access road construction and the addition of 19 new wood-pole structures, the contribution of the Proposed Action to cumulative impacts on land use would be low.

**Visual Quality**: Temporary and permanent visual impacts would be low, except for low to moderate impacts on residential land uses, as noted below.

• Construction activities would temporarily detract from the scenic nature of the U.S. Highway 101 (U.S. 101) corridor in a few areas where the transmission line corridor is visible to motorists.

- An increase in the height of most structures and the installation of spiral bird diverters on conductor spanning Floras Creek and the Sixes River would permanently increase the visibility of the transmission line from U.S. 101. The distance between the transmission line corridor and the highway, combined with the relatively small increase in structure height and relatively high traffic speeds of motorists, would reduce the sensitivity of motorists to these impacts.
- Views of construction activities from residences would result in permanent impacts. Transmission line structures would be more visible from some residences due to increased structure height and conductor may be more visible to some residents in several areas due to the installation of spiral bird diverters. These permanent impacts would be low to moderate impact depending on the view of residents and the proximity of homes to the transmission line.
- Temporary views of construction from recreational facilities would be partially screened by the trees and topography and would only be visible in the distance. Views of construction activities by recreational users could temporarily detract from the natural visual environment of the area. The installation of spiral bird diverters on conductor spanning South Twomile Creek would permanently increase the visibility of the transmission line from one golf course.
- Views of maintenance activities would be temporary and localized and would not result in any new or different impacts on visual resources.
- Because of the extremely limited nature of the visual changes resulting from the Rebuild Project, the contribution of the Proposed Action to cumulative impacts on visual resources would be low.

**Geology and Soils**: Potential impacts on soils would be minimized through implementation of mitigation measures, including best management practices and a Stormwater Pollution and Prevention (SWPP) Plan, which would address measures to reduce erosion and runoff and to stabilize disturbed areas. Impacts on geology and soils would be low to moderate.

- Use of heavy equipment during construction and maintenance would result in soil compaction and soil disturbance that would increase the potential for erosion. Because disturbance would be localized and minimal, it would not significantly increase or permanently alter stormwater runoff with the implementation of best management practices.
- Although unstable landslide areas exist throughout the study area, structures and new access roads would not be constructed in active slide areas.
- With implementation of mitigation measures and best management practices to protect soils and reduce the potential for erosion, the contribution of the Proposed Action to cumulative soil impacts would be low to moderate.

**Vegetation**: Impacts on vegetation would be low to moderate, with the implementation of mitigation.

- Structure work would remove or temporarily disturb up to 62 acres of vegetation, mostly shrubland and nonnative grasslands with some higher quality plant communities in a few areas, but impacts would be minimized by the restriction of construction work areas to limit disturbance to vegetation.
- Both western lily populations in the study area are near construction areas; they would be protected by fencing. Some on-site and off-site habitat enhancement of western lily populations would result in some beneficial effects on these populations.
- Construction-related ground disturbance and danger tree removal would open up new areas for weed infestation. Impacts from weed spread could be moderate to high without appropriate mitigation. The Weed Management Plan (Appendix D of the Final EA) includes measures that would be implemented to reduce impacts from weeds to moderate levels.
- Use of best management practices to help avoid or limit movement of soils between work areas would help prevent inadvertent spread of the Port-Orford-cedar root disease pathogen.
- Maintenance activities would result in localized vegetation disturbance and danger tree removal, but would help control weeds through ongoing vegetation management activities.
- Although the overall impact of the Proposed Action on vegetation is small, the cumulative impact on vegetation is considered moderate because of the potential to spread noxious weeds.

**Waterways and Water Quality**: Impacts on waterways and water quality would be low to moderate with implementation of mitigation measures, best management practices, and a SWPP Plan, which would include measures to reduce erosion and runoff, stabilize and reseed disturbed areas, and prevent and contain any accidental spills.

- Construction and maintenance activities that would increase turbidity, such as culvert installation and soil disturbance, would be limited to specific locations. Temporary increases in turbidity would be minimized through the use of mitigation measures and best management practices.
- Construction of properly designed access roads would improve stormwater conveyance by directing the flow of surface water into vegetated areas where water would slowly infiltrate soils. The proper sizing of culverts would accommodate 100-year flows.
- To prevent water contamination from chemical spills, equipment would be cleaned prior to entering waterways for instream work, and equipment refueling and staging of equipment would not be done within 150 feet of water features. A Spill Prevention and Treatment Plan would address prevention of spills and prompt clean-up.

- Increases in stream water temperatures could result from vegetation removal in riparian areas. To mitigate for any increases in water temperature, vegetation removal would be minimized and off-site stream restoration would be conducted along three temperature-impaired waterways (Butte Creek, Willow Creek, and the Elk River).
- Compared with the extent of ground disturbance associated with past and current land uses in the project vicinity, the contribution of the Proposed Action to cumulative water quality impacts would be low

**Wetlands**: Through careful planning, most impacts on wetlands were avoided. Unavoidable impacts on wetlands would result in low impacts, except for potential impacts from maintenance activities.

- Installation of six structures that currently are located in wetlands would require less than 5 cubic yards of permanent wetland fill.
- Access road work would result in approximately 0.12 acre of permanent wetland fill.
- Construction activities would result in temporary wetland disturbance, including the disturbance of wetland vegetation and compaction of soils, and approximately 0.28 acre of temporary wetland fill. Temporary wetland impacts would not permanently alter wetland hydrology or wetland vegetation.
- Maintenance activities would result in localized impacts on wetlands that would generally be temporary; impacts would be low to moderate, depending on the type of work, quality of wetland, and extent of impacts.
- Wetlands in the project vicinity have been cumulatively affected through destruction and degradation from various land uses. Because the Proposed Action would fill less than 0.5 acre of freshwater wetlands, it would contribute in an extremely minor way to cumulative impacts on wetlands in the project vicinity.

**Floodplains**: No new project elements (wood-pole structures or access roads) would be constructed in floodplains. Unavoidable impacts on floodplains would be low.

- Impacts within floodplains from removal and replacement of six existing wood-pole structures and work on existing access roads (approximately 0.29 mile), including soil compaction, vegetation removal, and increased sedimentation, would be temporary and localized and conditioned by the use of best management practices to minimize sedimentation. Work within floodplains would only minimally alter floodplain functions and would not alter the existing flood storage capacity.
- Impacts on floodplains from work on existing access roads outside of but within 200 feet of floodplains (approximately 0.8 mile) could result in the deposition of incidental amounts of sediments in floodplains and would not alter floodplain functions.
- The removal of six danger trees near the Johnson Creek floodplain would not result in erosion, because they would be cut with roots left intact.

- Maintenance activities within or near floodplains would deposit incidental amounts of sediment into floodplains.
- Overall, the Proposed Action is not expected to contribute noticeably to cumulative changes in floodplain qualities and function, due to the small area that would be affected.

**Fish**: Impacts on fish and fish habitat would be low to moderate, with implementation of mitigation and best management practices.

- Installation of fish-passage culverts could cause harm to fish through disturbance, injury, or mortality, but impacts would be minimized through implementation of mitigation and conservation measures required by National Marine Fisheries Service (NMFS) and Oregon Department of Fish and Wildlife (ODFW).
- Culverts that would be installed within fish-bearing streams were designed to meet NMFS and ODFW criteria for fish passage and all culverts would be installed during the ODFW-approved instream work period.
- Construction and maintenance activities could impact fish habitat, if sediments from work areas reach streams. Implementation of mitigation measures, including best management practices, would limit impacts.
- Removal of four danger trees near streams is not likely to affect fish, because the small amount of cover that would be removed would not be expected to increase water temperatures to a level that could affect fish.
- The use of herbicides during ongoing vegetation management could affect water quality in riparian areas, but only herbicides approved for work near water would be used.
- Construction activities and vegetation removal would affect Pacific coast salmon Essential Fish Habitat. With the implementation of mitigation measures, project activities are not likely to reduce the abundance or distribution of coho or Chinook salmon or to adversely modify the ecosystem to the extent that measurable effects on spawning, feeding, or growth to maturity for coho or Chinook salmon would result.
- Rebuild Project activities would not degrade Oregon Coast and Southern Oregon/Northern California Coasts coho salmon designated critical habitat within the study area, with the implementation of mitigation measures.
- The Proposed Action would temporarily contribute in a minor way to the cumulative impacts on fish and fish habitat. However, the Proposed Action could reduce some cumulative impacts through the following beneficial effects: 1) restoration of access to historical fish habitat through the removal of two fish passage barriers, and 2) decreased amount of sediment delivered to streams through improvements to access roads.

**Wildlife**: Impacts on wildlife from habitat modification, degradation, or loss and disturbance of wildlife would be low to moderate.

- Construction and maintenance activities would result in the temporary loss of vegetation in work areas but the degradation of wildlife habitat would be temporary and would generally occur within areas where vegetation is managed on an ongoing basis.
- Installation of 19 new structures would require construction of less than 1 mile of new unpaved access roads, resulting in a minimal loss of habitat, which is not expected to adversely affect the viability or survival of species at the population level.
- Areas disturbed by construction and maintenance could result in degradation of wildlife habitat, if these areas are invaded by noxious weeds. This potential impact would be mitigated through implementation of weed control activities as described in the Weed Management Plan (Appendix D of this EA). Degradation of habitat below existing conditions is not expected.
- Construction and maintenance activities would result in increased noise and activity levels, which could temporarily displace wildlife near work areas, but disturbance would be temporary and wildlife would be expected to return after work is complete.
- Danger tree removal would not be conducted until after August 15 to minimize displacement of wildlife, including nesting birds.
- Although there are no known problem areas for bird collisions with the transmission line, the potential for bird collisions would be reduced by the installation of spiral bird diverters on conductor spanning areas frequented by birds (Aleutian cackling geese, marbled murrelet and other species), including Twomile Creek, South Twomile Creek, Floras Creek, Crystal Creek, Sixes River, and Elk River.
- Nesting bald eagles would not be affected, because known eagle nests are approximately 1,600 feet from work areas, well beyond the 660-foot buffer recommended by the U.S. Fish and Wildlife Service (USFWS). The Rebuild Project would result in minimal disturbance to bald and golden eagle foraging resources.
- Northern spotted owl and marbled murrelet nesting, roosting, foraging, and dispersal habitat would not be modified under the Proposed Action. Disturbance of nesting northern spotted owl and marbled murrelet would be minimized through implementation of restrictions on the time of work, as agreed upon with USFWS. These species are not expected to permanently abandon the study area and no reduction in the abundance or their distribution is expected.
- The Proposed Action would contribute in a minor way to cumulative impacts on wildlife habitat through temporary disturbance during construction and maintenance and permanent removal of extremely small areas of wildlife habitat.

**Cultural Resources**: Impacts on cultural resources eligible for the National Register of Historic Places (NRHP) are expected to be low to moderate after mitigation, depending on the level and amount of impact.

- Four existing structures would be replaced and some access road work would be conducted within the boundaries of four prehistoric sites eligible for the NRHP. BPA is consulting with the State Historic Preservation Officer and tribes who elected to participate in Section 106 consultation to create a Cultural Resources Mitigation Plan that will minimize impacts on these prehistoric sites.
- Construction and maintenance activities could result in some impacts on known and unknown cultural resources; those potential impacts would be low to moderate depending on the level and amount of disturbance and type of site.
- Because the Proposed Action would adversely affect prehistoric sites, it would contribute incrementally to cumulative impacts on cultural resources.

**Socioeconomics and Public Services**: Impacts on socioeconomics and public services would be low and some effects would be beneficial.

- The 8-month construction period would not be long enough to induce any permanent changes in the study area population or permanently affect economic activity in the area, although the rebuilt transmission line could contribute to regional stability and economic growth by reliably meeting power demands, a long-term beneficial effect.
- The local economy would be temporarily stimulated through some material purchases in the area, payroll to construction workers, and related indirect or multiplier effects, a short-term beneficial effect.
- Temporary interference with agricultural and forestry operations along the right-of-way would occur but is not expected to result in long-term disruption.
- During construction, some temporary impacts on property value and salability could occur on an individual basis, but they would not likely last in any one location for more than a few days. The Proposed Action would have no impact on property taxes, because the footprint of the transmission line would not change.
- Construction and maintenance activities would have a temporary and minimal impact on public services.
- The Proposed Action would not noticeably contribute to cumulative impacts on socioeconomics and public services because of the minimal, temporary nature of impacts.

Noise: Noise impacts from construction and maintenance work would be low to moderate.

• Construction and maintenance activities would result in a temporary increase in ambient noise for some sensitive receptors; the level of impact would depend on the proximity of sensitive noise receptors to the noise disturbance.

- Operation of the rebuilt transmission line would continue at 115 kV, resulting in noise levels that could slightly exceed nighttime state noise standards at the western edge of the right-of-way under wet conditions. However, noise levels would likely decrease to below the 45-dBA nighttime threshold at nearby residences.
- Because noise created during construction and maintenance would be temporary and the noise levels from operation of the rebuilt transmission line would be comparable to those of the existing transmission line, the Proposed Action would not contribute to an increase in long-term cumulative noise impacts in the project vicinity.

Public Health and Safety: Impacts on public health and safety would be low.

- Health and safety risks associated with construction include increased risk of electrical shocks or fires from high-voltage equipment and increased risk of fires and injury from the use of heavy equipment and hazardous materials near high-voltage lines. Standard construction safety procedures, including development of a Safety Plan, would be required and employed to minimize safety risks.
- Although a small increase in electric fields is predicted within the right-of-way, this increase would be negligible and no changes are expected beyond the right-of-way. Because some structure heights would increase, ground-level electric fields would decrease slightly within some portions of the right-of-way.
- The slight increase in magnetic fields projected along the edge of the right-of-way is less than the exposure generated by a television and is considered to be negligible.
- The Proposed Action is expected to either not change or possibly slightly reduce radio and television interference along the right-of-way.
- The Proposed Action would not cumulatively increase the overall level of electromagnetic frequency exposure along the right-of-way and the rebuilt transmission line would have similar levels to those of the existing line.

Air Quality: Impacts on air quality would be low.

- Construction activities could temporarily increase dust and particulate levels in localized areas, but this would be partially reduced by implementing dust suppression methods.
- Operation of heavy equipment during construction and maintenance could result in temporary and localized increases in air pollutants.
- Operation of the transmission line emits limited amounts of ozone and oxides of nitrogen as a result of the corona effect; however, these substances are released in quantities generally too small to be measured or to have an impact on humans, animals, or plants. Corona emissions under the Proposed Action would be similar to levels present under existing conditions.

• While the Proposed Action would contribute a small amount to cumulative air pollutant levels, it is not expected that cumulative concentrations would result in a violation of air quality standards.

Greenhouse Gases: Impacts from greenhouse gas (GHG) emissions would be low.

- GHG emissions from the use of gasoline- and diesel-powered vehicles during construction and from land use changes as a result of structure and road construction would be below the U.S. Environmental Protection Agency's mandatory reporting threshold.
- All levels of GHG emissions, from small to large, play a role in contributing to global GHG concentrations and climate change. Given the extremely low amount of contribution of the Rebuild Project, however, the cumulative impact on GHG concentrations would be low.

*Floodplain Statement of Findings:* This Floodplain Statement of Findings was prepared in accordance with 10 CFR Part 1022. BPA is proposing to rebuild the existing Bandon-Rogue transmission line in the existing right-of-way that crosses the 100-year floodplains of Johnson Creek, Crooked Creek, Twomile Creek, South Twomile Creek, Fourmile Creek, and Bethel Creek in Coos County; and Floras Creek, Sixes River, Elk River, Hubbard Creek, and Euchre Creek in Curry County. An assessment of impacts on floodplains is summarized below and discussed in greater detail in Chapter 3.8 of the Final EA.

During the design phase of the Rebuild Project, impacts to 100-year floodplains were avoided by locating all proposed new project elements outside floodplains. New wood-pole structures or access roads that do not currently exist would all be located at least 200 feet from floodplains.

Work within floodplains would include removal and replacement of six existing wood-pole structures. Structures 14/4 and 14/5 would be replaced within the floodplain along Floras Creek. Structures 24/3, 24/4, and 24/5 would be replaced in the floodplain along the Elk River. Structure 40/5 would be replaced in the floodplain along Euchre Creek. These structures could not be relocated outside floodplains due to engineering constraints.

Road work would be conducted on some existing unpaved access roads within 100-year floodplains. BPA is unable to avoid use of these existing access roads within floodplains. Due to the steep terrain in these areas, there are no other practicable alternatives to reach these structures. Because these access roads are also used by farmers and residents, these roads would continue to exist in floodplains even if BPA sought alternate access.

Access road work within floodplains would include improving and reconstructing some roads. Improving access roads involves grading and rocking the road surface. Approximately 750 feet (0.14 mile) of access road would be improved within the floodplain along Floras Creek (50 feet) and along Hubbard Creek (700 feet). Access road reconstruction involves work on the road bed in addition to the road surface. Approximately 800 feet (0.15 mile) of access road would be reconstructed within floodplains, including the replacement of two culverts. Unavoidable direct floodplain impacts could occur as a result of soil compaction, vegetation removal, and increased sedimentation. Effects from construction within floodplains would be temporary and localized. Conductor tensioning sites would be located outside of floodplains, where possible. Impacts from construction would be minimized through the use of best management practices to minimize sedimentation. Relevant best management practices that would be implemented include the following.

- Conduct peak construction activities during the dry season (between June 1 and November 1), as much as possible, to minimize erosion, sedimentation, and soil compaction.
- Inspect erosion and sediment controls weekly, maintain them as needed to ensure their continued effectiveness, and remove them from the site when vegetation is re-established and the site has been stabilized.
- Design and construct access roads to minimize drainage from the road surface directly into surface waters, size new and replacement culverts large enough to accommodate predicted flows, and size and space cross drains and water bars properly to accommodate flows and direct sediment-laden waters into vegetated areas.
- Delineate construction limits within 200 feet of streams, other waterbodies, wetlands, and floodplains; manage sediment as specified in the SWPP Plan, with an approved method that meets the *Stormwater Management Manual for Western Washington* (Washington State Department of Ecology 2005) erosion and stormwater control best management practices, to eliminate sediment discharge into waterways and wetlands, minimize the size of construction disturbance areas, and minimize removal of vegetation, to the greatest extent possible.

With the implementation of best management practices, construction would only minimally alter floodplain functions and would not alter the existing flood storage capacity. Therefore, direct impacts on floodplains from construction activities are expected to be low.

Indirect impacts on floodplains could occur where structure and access road construction would occur outside of but within 200 feet of floodplains. Activities within 200 feet of floodplains include replacing three existing wood-pole structures near floodplains (Two mile Creek, Elk River, and Euchre Creek). Access road improvement (a total of approximately 2,200 feet or 0.42 mile) would take place near Johnson Creek, Sixes River, Elk River, and Hubbard Creek floodplains. Access road reconstruction (a total of approximately 2,000 feet or 0.38 mile) would take place near Crooked Creek, Floras Creek, and Elk River floodplains. Impacts would be limited to incidental amounts of sediment deposition in the floodplain from soil erosion in disturbed areas. Therefore, this would be a low impact.

Operation and maintenance activities within and near floodplains could result in direct and indirect impacts on floodplains. Impacts would be limited to incidental amounts of sediment

deposition in the floodplain from soil erosion in disturbed areas and removal or disturbance of vegetation from vegetation management activities. These impacts would not result in significant changes to floodplain capacity nor would they alter flood flows. Therefore, this would be considered a low impact.

Past, present, and future activities in the project vicinity, including utility and road construction and maintenance, agricultural activities, forestry, and residential and recreational development have cumulatively affected floodplains. Overall, the Proposed Action is not expected to contribute noticeably to cumulative changes in floodplain qualities and function, due to the small area that would be affected.

The Proposed Action conforms to applicable state or local floodplain protection standards. BPA will allow 15 days of public review of this statement of findings before implementing the Proposed Action.

**Determination:** Based on the information in the Final EA, as summarized here, BPA determines that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA, 42 USC 4321 et seq. Therefore, an EIS will not be prepared and BPA is issuing this FONSI for the Proposed Action.

Issued in Portland, Oregon.

<u>/s/ F. Lorraine Bodi</u>
F. Lorraine Bodi
Vice President
Environment, Fish and Wildlife

<u>May 3, 2011</u> Date This page left intentionally blank.