Bonneville-Hood River Transmission Line Rebuild Project Finding of No Significant Impact (FONSI)

Bonneville Power Administration DOE/EA-1981 June 2018

SUMMARY

Bonneville Power Administration (BPA) announces its environmental findings on the Bonneville-Hood River Transmission Line Rebuild Project. The project would rebuild nearly 23 miles of the Bonneville-Hood River No. 1 115-kilovolt (kV) transmission line and an associated tap line in Multnomah and Hood River counties, Oregon.

BPA has prepared an environmental assessment (EA) evaluating the Proposed Action, including three Line Mile 19 Options, and the No Action Alternative. Based on the analysis in the EA, BPA has determined that the Proposed Action, with implementation of Line Mile 19 Option 1, 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 (42 United States Code [USC] 4321 *et seq.*). Therefore, the preparation of an environmental impact statement (EIS) is not required and BPA is issuing this Finding of No Significant Impact (FONSI) for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS and is not without precedent.

The comments received on the Draft EA and responses to the comments are included in the Final EA. The Final EA also identifies changes made to the Draft EA.

Prior to issuing this FONSI, BPA prepared a Mitigation Action Plan (MAP) that lists all of the mitigation measures that BPA and its contractors are committed to implementing. That MAP is attached. The FONSI also includes a statement of findings on how the Proposed Action impacts wetlands and floodplains. Impacts to wetlands and floodplains would be avoided where possible and minimized by the mitigation measures included in the EA and the MAP where there is no practical alternative.

PUBLIC AVAILABILITY

This FONSI and attached MAP will be mailed directly to individuals who previously requested a copy; a notification of availability will be mailed to other potentially affected parties; and the Final EA, FONSI, and MAP will be posted on the project website:

www.bpa.gov/goto/HoodRiver.

PROPOSED ACTION

BPA proposes to rebuild structures and replace conductor and/or hardware along about 22 miles of its existing 23-mile-long, 115-kV Bonneville-Hood River transmission line and the existing approximately 400- foot-long Cascade Locks Tap, and also to improve the access road and foot trail system that allows BPA to get to and from the Bonneville-Hood River transmission line. The Bonneville-Hood River transmission line extends in an easterly direction from the existing Bonneville Dam Powerhouse on the Columbia River in Multnomah County, Oregon to BPA's existing Hood River Substation in Hood River County, Oregon. The Cascade Locks Tap connects the Bonneville-Hood River transmission line to the existing Cascade Locks Substation in the town of Cascade Locks.

Portions of the Bonneville-Hood River transmission line and associated tap are in poor condition due to normal deterioration and aging. Due to these conditions, portions of the line have begun to fail in recent winter months, resulting in outages requiring emergency repair. The age, continuing deterioration, and overall poor condition of the line create the risk of additional outages that would adversely affect power deliveries to BPA's customers in the Columbia River Gorge and eastern Oregon and pose safety risks for BPA transmission line workers and the public. In addition, the existing road and foot trail system that BPA uses to access the transmission line is in poor condition and does not extend to all structures, making both scheduled maintenance and emergency repairs unsafe.

The Proposed Action would primarily involve removing existing structures, installing replacement structures, installing replacement conductor and associated equipment, and improving and reconstructing portions of the existing access system. The Proposed Action also includes three options for rebuilding a portion of the existing line at Line Mile 19. The main differences between these three options is the configuration for reconstruction of an existing access road to bring it up to current safety standards, the type of transmission structures to be installed, and the construction methods involved to install the transmission structures.

Project construction would likely begin in the summer of 2018 and extend into 2021. Details of the Proposed Action are presented in Chapter 2 of the EA.

NO ACTION ALTERNATIVE

Under the No Action Alternative, BPA would not rebuild the transmission or tap line and would continue to operate and maintain the existing transmission line and tap line. Construction activities associated with the Proposed Action would not occur. It is reasonable to expect that as the transmission line structures would continue to fail intermittently, the ability of BPA to provide reliable electric service to its customers in the area would be adversely affected and the safety concerns that prompted this proposal for action would persist.

Right-of-way vegetation management would continue under the No Action Alternative, including the removal of up to 211 danger trees identified in or near the right-of-way. Further, BPA would continue to attempt to maintain the existing transmission line as its aged and rotting wood poles, hardware, conductor, and cross arms further deteriorate. Because of the condition of the transmission line, it is likely that the No Action Alternative would result in more frequent maintenance activities within the corridor than under the Proposed Action. It might be possible

to plan some of this maintenance, but it is expected that the majority of repairs would occur on an emergency basis as various parts of the transmission line continue to deteriorate. Emergency repair activities could affect vegetation, wildlife, soils, water quality, and other natural resources in the immediate vicinity, and any downed transmission line resulting from structure failures would have a potential for causing fires in the vicinity of the downed transmission line.

SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION

To determine whether the Proposed Action has the potential to cause significant environmental effects, the potential impacts of this alternative on human and natural resources were evaluated and presented in Chapter 3 of the EA. The potential impacts associated with the Proposed Action are summarized below. To evaluate potential impacts from construction, operation, and maintenance activities, four impact levels were used – high, moderate, low, and no impact. These impact levels are based on the considerations of context and intensity defined in Council of Environmental Quality regulations (40 Code of Federal Regulations 1508.27). High impacts could be considered significant impacts, if not mitigated, while moderate and low impacts are not. Direct, indirect, and cumulative impacts were evaluated and the Proposed Action would have no significant impacts.

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 TRANSPORTATION

Impacts would be low to land use and moderate in the short term and low in the long term to transportation.

- Underlying land ownership would not change.
- Only about 0.5 acre of forest and developed lands would be converted to permanent facilities. Land use conversions would largely occur within the existing right-of-way and road and trail beds.
- Although about 70 acres of agricultural, forest, and developed lands would be temporarily disturbed by construction, these temporary disturbance areas would largely return to pre-project conditions after construction activities are completed.
- Construction-related disruptions to about 3.8 acres of agricultural lands would be mitigated by compensating landowners for damaged crops, restoring compacted soils, using BMPs to limit the spread of noxious weeds, separating topsoil in croplands, and minimizing disturbance to agricultural activities.
- About 57 acres of forest land would be temporarily impacted by structure removal and replacement, hardware or conductor replacement, as well as access road and trail improvements and reconstruction. The area impacted would be small when compared to the total of 343 acres of forest land within the project area (i.e., the transmission line right-of-way, and even smaller when compared to total acreage of forest land in the project vicinity. In addition, construction would primarily occur on existing access roads and trails, and within the existing right-of-way, resulting in minimal clearing of trees.
- Due to the temporary nature of project disturbance and the very limited extent of permanent alteration (about 0.5 acre) to an already existing transmission facility located

- within the National Scenic Area, the Proposed Action would not be expected to result in any significant changes in land use within the National Scenic Area.
- While the project would result in a temporary disruption to uses to lands funded by the Land and Water Conservation Fund, the project would not result in the permanent conversion of any of these recreational lands to a non-recreational use and would be consistent with the requirements of the Land and Water Conservation Fund.
- Traffic delays and disruptions to the pedestrian and bicycle network associated with lane/road closures would be temporary and would shift based on the construction schedule such that no one location would experience traffic increases or closures for more than a few days at a time.
- Construction activities would not close/block access to residences or businesses.

RECREATION

Impacts would be low to moderate for recreation.

- The primary impacts to recreation would be temporary. Construction activities would create temporary traffic through campgrounds, result in temporary trail and road closures, and temporarily create localized noise and dust that could disturb recreational uses. Mitigation measures, including actions to limit construction in recreational areas to weekdays (when recreation is typically lower), maintain access to recreational sites and trails, and coordinate construction activities and timing with the U.S. Forest Service, Oregon State Parks, and festival and special event coordinators, would reduce the magnitude of these short-term effects.
- Public trail improvements, totaling approximately 0.5 mile, would improve the recreational experience in some locations and would be a long-term beneficial improvement.
- New gates in several locations to discourage unauthorized access would be constructed and BPA would work with land managers to identify additional measures to limit unauthorized access. Further, the maximum length that any trail or road would be extended is approximately 300 feet (less than 0.1 of a mile); therefore, new access would not be provided to any additional areas that do not already have access.

GEOLOGY AND SOILS

Impacts would be low to geology and soils.

- Although temporary construction for structures would occur within 27.8 acres of landslide deposits and thus could result in destabilized slopes, the risk of landslide would be reduced through the use of geotechnical investigations prior to construction and the use of micropile foundations to minimize disturbance to potentially unstable areas.
- Construction activities for structure replacement would temporarily disturb up to about 70 acres of soil, which would be revegetated. An estimated 21 acres would be temporarily disturbed for access road and foot trail work. Of this soil disturbance area, structure replacements would temporarily disturb about 12 acres that have a severe erosion hazard rating. Measures such as limiting construction to the dry season, use of erosion control devices, and revegetation would limit erosion in disturbance areas, including those with a high erosion potential.

• Soil erosion along roads and trails would be improved through the addition of water control structures, such as waterbars, drain drips, and new gravel surfacing.

VEGETATION

Impacts would be low to vegetation.

- Less than 1 acre of vegetation would be permanently removed to allow for project access.
- Construction would temporarily remove or crush up to about 70 acres of vegetation. Most of this vegetative disturbance would occur within the existing, maintained right-of-way and along existing roads and trails.
- Only a small amount of riparian habitats (0.7 acre) and Oregon white oak woodland (0.9 acre) would be temporarily impacted by the project, and mitigation would minimize or avoid impacts to other sensitive habitats.
- Overall, the project would temporarily impact only 0.3 acre of special-status plants, and
 work areas in these sensitive areas would be limited to the extent practical and would be
 revegetated upon project completion. Additional pre-construction botanical surveys also
 would occur to confirm and mark sensitive plant locations as they exist immediately prior
 to construction.
- Noxious weed infestations already exist throughout the transmission line and BPA would implement mitigation measures, such as wash and blow stations and revegetation with native seeds, to prevent further spread of weeds.

WATERWAYS AND WATER QUALITY

Impacts would be low to waterways and water quality.

- Structure, bridge, access road, and foot trail work for the Proposed Action would result in a total of less than 0.1 acre of permanent disturbance and 3.0 acres of temporary disturbance within 100 feet of streams. Use of erosion control devices and minimizing project workspaces near waterbodies would minimize the potential introduction of sediment. Additionally, all temporary disturbance areas from structure, bridge, access road, foot trail, road ford reconstruction, and bridge work would be restored to preconstruction conditions to the extent possible, which would include reseeding with an appropriate native upland, riparian, or wetland seed mix.
- Removal of a total of up to 23 trees within 100 feet of streams is not expected to affect stream hydraulic, hydrologic, or habitat functions, or result in exceedance of water quality parameters.
- Repair or installation of fords and culverts would occur during the dry season during the in-water work window to minimize instream sediment delivery.
- There are no surface water Drinking Water Source Areas within 150 feet of the project area, and no work areas proposed near the Cascade or Oxbow fish hatchery surface water intakes.
- About 0.5 acre of temporary ground disturbance would occur in the Herman Creek Well #1 and #2, Starvation Creek Park, and Viento State Park Drinking Water Source Areas. Soil compaction during structure, access road, and trail work could temporarily impact groundwater flows by reducing infiltration capacity and increasing surface runoff to streams. These work areas would not result in a permanent net increase in impervious

- surfaces, so there would be no permanent impact on groundwater recharge associated with structure work.
- If any releases of hazardous materials (e.g., fuels, lubricants, solvents) occurs during construction, these releases would be immediately contained and cleaned up, and BPA would dispose of regulated materials as identified in the spill prevention, containment, and cleanup procedures for the project.

WETLANDS AND FLOODPLAINS

Impacts would be low to wetlands and floodplains.

- No structure work would occur in wetlands, and access road and trail improvements would have minor permanent impacts to less than 0.005 acre of wetland.
- A total of 3.4 acres of temporary disturbance would occur within wetland buffers, but potential impacts to nearby wetlands from project work in these buffers would be avoided or minimized through the use of erosion and sediment control BMPs, revegetation of exposed soil, and re-planting temporarily impacted areas with native species.
- The Proposed Action would not result in ground disturbance in the portion of the Indian Creek floodplain within the project area.

FISH

Impacts would be low to fish.

- Work would occur at only one structure within 100 feet of a fish-bearing stream, and access road and trail improvement and reconstruction would occur within 100 feet of only eight fish-bearing streams. This work would not be conducted in-water and would not involve the removal of riparian habitat, and erosion control devices would be installed in work areas near waterbodies to limit the introduction of sediment to waterbodies from structure and access road work. If sediment does reach fish habitat, sediment inputs would be a small pulse and temporary in duration.
- No more than four trees would be removed from within 100 feet of any one stream, thereby not reducing tree canopy to an extent that would result in a measurable increase in solar loading at any of the fish-bearing waterbodies.
- Work in fish-bearing streams would be limited to repair of an existing road ford in Dry
 Creek and construction of a new ford in Harphan Creek. All instream work would be
 conducted during the in-water work window and ford use would be limited to the inwater work window or a temporary bridge would span the waterbodies outside of the inwater work window.
- Construction would not occur in segments of streams that support ESA-listed Chinook salmon, coho salmon, chum salmon, and steelhead nor their associated Essential Fish Habitat (EFH).

WILDLIFE

Impacts would be moderate in the short term and low in the long term to wildlife.

- Only about 0.1 acre of priority habitats would be permanently impacted by the Proposed Action.
- About 19.5 acres of priority habitats would be temporarily impacted by the Proposed Action, which in addition to being only temporary, would be a relatively small amount compared to the quantity available in the general project area.
- Although wildlife would be disturbed by construction noise, which may result in
 disruption of wildlife movement and foraging, most mobile wildlife species (e.g., deer,
 birds, etc.) would relocate from these temporary disturbance areas to nearby areas during
 construction because wildlife habitats in the project area are well connected to other
 similar habitats.
- Construction may result in the incidental mortality of less mobile species, though
 mortality would not be anticipated to occur at a scale that would result in population-level
 impacts.
- Construction timing restrictions would limit disturbance to, or mortality of, sensitive species such as wintering big game, pika, and nesting birds. Larch Mountain salamanders and aquatic mollusk and amphibians would be moved out of work areas should they be identified prior to construction.
- No ESA-listed wildlife species have been identified within the project area.

VISUAL QUALITY

Impacts would be moderate in the short term and low in the long term to visual quality.

- Although structure heights would increase 5 to 15 feet, the structures would remain lower than the typical tree height for the area and therefore would not result in increased visibility where structures are currently screened by vegetation. The brown color, coarse texture, and non-reflective finish of the wooden and weathering steel monopoles are similar to colors found in the surrounding natural environment. However, the weathering steel monopoles would have a somewhat higher contrast than the existing structures when viewed against the lighter colored backgrounds of the non-vegetated talus slopes such as Shellrock Mountain (line mile 12) or the skyline. Conversely, the vertical lines introduced by H-frame and monopole structures would more closely align with the natural vertical lines of surrounding trees in forested areas.
- Proposed retaining walls, roads improvements/extensions, and tree removal would be the most visible project features. Due to the small amount of road extensions (0.3 mile), retaining walls designed to blend into surroundings (e.g., non-galvanized wire, local rock), dispersed vegetation removal, and steep viewing angles and tall mature trees would block views, these project features would not appear dominant from recreational areas within the National Scenic Area and would be easily overlooked by the casual viewer.
- Collectively, the project structures would maintain weak to moderate contrast against the existing landscape, particularly where viewed from middleground or background distance zones.

AIR QUALITY AND GREENHOUSE GASES

Impacts would be low to air quality and greenhouse gases.

• Construction activities would generate criteria pollutant emissions, predominately in the form of ozone, carbon monoxide, particulate matter, and dust within the project area airshed, but these emissions would be short term, highly localized, and relatively minor, and would not have the potential for exceeding regulatory air quality standards or significantly contributing to visibility reduction or regional haze. In addition, implementation of dust suppression measures and other identified air quality-related mitigation measures would further minimize these impacts. Air quality standards would not be violated under the Proposed Action.

SOCIOECONOMICS AND PUBLIC SERVICES

Long-term impacts would be no to low for socioeconomics and public services, but there would be short term moderate impacts to public services.

- The scale and duration of construction is not expected to alter the population in Hood River or Multnomah counties because the temporary and short-term nature of the work would not typically require workers to change their permanent residences.
- The Proposed Action would have a small, positive impact on the regional economy during construction; this impact would be temporary and low.
- For replacement of structures on the Indian Creek Golf Course. BPA would work with golf course management to schedule construction to minimize disruptions to golf course operations as best as possible.
- BPA would coordinate with local farmers and landowners to minimize potential
 construction-related disruptions, and temporary roads would be restored to pre-project
 conditions after construction is complete. If project construction in the vicinity of
 orchards results in crop damage or displaces crop production. BPA would compensate
 landowners for revenue losses they would incur. Because the disruptions would be
 temporary and landowners would be compensated for revenue losses, the economic
 impact would be low.
- The Proposed Action would not result in the removal or permanent alteration of tourism facilities. Any disruption to tourism facilities would be short-term and temporary.
- BPA would only remove up to 380 trees, including the up to 211 danger trees. Tree
 removal would be distributed along the 22-mile-long project area such that no single
 landowner would be disproportionately affected by their removal. BPA would
 compensate landowners for removal of merchantable trees.
- The Proposed Action would not be expected to affect nearby property values and would not affect the amount of taxes collected by the counties crossed by the project transmission line.
- There would be no disproportionate adverse effects to environmental justice populations.
- The Proposed Action would not hinder the ability of any agency or organization to provide public services to communities near the project area, including police, fire, and medical. Although work on the Cascade Locks Tap would require two temporary power outages to the City of Cascade Locks, these planned outages would result in more reliable

long-term power delivery, and BPA would plan these outages to occur overnight and would communicate and coordinate them with the City.

CULTURAL RESOURCES

Impacts would be no to low for archeological resources and moderate on built resources.

- The identified archaeological sites would not be adversely affected by the Proposed Action. Site 35HR154 (refuse scatter), which is located within a pulling and tensioning site near structure 19/1, has been previously disturbed by line construction and maintenance. While most activities associated with the tensioning and pulling of the Proposed Action would be located outside of the site, some pulling and tensioning equipment would be located on the existing access road and landing within the site boundary. As the existing access road and landing have been used for years, the continued use of these areas to facilitate pulling and tensioning would not affect this site.
- The Proposed Action could result in vandalism and looting of cultural resource sites due
 to improved access from road improvement. To minimize the potential for unauthorized
 use of access roads, BPA would install gates to reduce unauthorized access to the cultural
 resource sites.
- The project would result in a change of several of the existing structure types along the Bonneville-Hood River transmission line, which is eligible for listing in the National Register. This change would make the line not eligible for listing in the National Register under Criterion C, but the line would still be eligible for listing in the National Register under Criteria A and D. BPA would mitigate for adverse effects on the line under the National Historic Preservation Act. Impacts to all other identified historic resources would be avoided.

NOISE, PUBLIC HEALTH, AND SAFETY

Noise impacts would be low to moderate in the short term and there would be no to low noise impacts in the long-term. Potential public health and safety impacts would be no to low.

- Noise impacts due to construction would be low to moderate because they would be short-term, intermittent, and transitory. Construction equipment noise would be similar to machinery noise from regular agricultural practices in the Hood River area, other construction-related noise such as from helicopters and blasting would be very intermittent and temporary. Corona noise from the transmission line would not change from current levels.
- Because the Proposed Action would not change line voltage, current loading, line configuration, or line routing, there would be no change in electromagnetic fields (EMF) or associated impacts.
- The Proposed Action is expected to either not change or slightly improve radio and television interference along the affected line sections.
- Potential public health and safety impacts resulting from construction of the Proposed
 Action could include wildfire ignition from heavy equipment operation; worker vehicle
 accidents during transport to/from work site; worker incident during operation of heavy
 equipment; aircraft hazards; blasting; worker exposure to hazardous materials used or
 waste generated during construction; worker proximity to high voltage lines; and

rockslide dangers during upslope activities, but these potential impacts would be reduced to a low level through the creation of a Public Health and Safety Plan that includes measures to control public access, use appropriate control measures, and generally limit the risk of rockfall.

FLOODPLAIN AND WETLAND STATEMENT OF FINDINGS

In accordance with the Department of Energy's NEPA implementing regulations and compliance with Floodplain and Wetland Environmental Review Requirements (10 CFR Part 1021 and 1022), BPA assessed the project's potential impacts to floodplains and wetlands (see Section 3.6 of the EA), considered alternatives to avoid impacts, and identified measures to mitigate adverse effects.

One project structure that would not be replaced but have hardware and conductor replaced would be located within a mapped floodplain. No ground disturbance associated with accessing this single structure would result in floodplain fill. Vehicles staged at the structure may result in a minor alteration of infiltration due to soil compaction; this would be localized, temporary, and likely not observable based on the limited work area relative to the overall size of the floodplain. The Proposed Action conforms to applicable state and local floodplain protection standards.

No permanent wetland disturbances would occur. While no structure work areas or access road or foot trail extensions are proposed in wetlands, proposed access road improvements, such as water bars and drain dip installation, would occur adjacent to delineated wetlands. These access road improvements would result in minor temporary disturbance of less than 0.1 acre. These temporary impacts would be minimized by using the existing road as much as possible and complying with conditions in the Oregon Department of State Lands Removal/Fill Authorization and US Army Corps of Engineers Section 404 permit. Additional measures that would be taken to minimize potential impacts to wetlands include working in the dry season if possible, flagging wetland boundaries, implementing erosion control measures, and reseeding disturbed areas.

BPA will allow 15 days of public review after publication of this statement of finding before implementing the Proposed Action in wetlands or floodplains.

DETERMINATION

Based on the information in the EA, as summarized here, and the implementation of the MAP, BPA determines that the Proposed Action, with implementation of Line Mile 19 Option 1, 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

/s/ F. Lorraine Bodi

June 8, 2018
Date

F. Lorraine Bodi Vice President Environment, Fish and Wildlife

Bonneville-Hood River Transmission Line Rebuild Project Mitigation Action Plan (MAP)

Bonneville Power Administration DOE/EA-1981 June 2018

SUMMARY

This Mitigation Action Plan (MAP) is included with the Finding of No Significant Impact (FONSI) for the Bonneville-Hood River Transmission Line Rebuild Project. This project would rebuild nearly 23 miles of the Bonneville-Hood River No. 1 115-kilovolt (kV) transmission line in Multnomah and Hood River Counties, Oregon.

This MAP is for the Proposed Action, inclusive of all three Line Mile 19 Options, and includes all of the integral elements and commitments made in the Environmental Assessment (EA) to mitigate potential adverse environmental impacts.

Bonneville Power Administration (BPA) and its contractors are responsible for implementing the mitigation measures during various phases of project construction. Relevant portions of this MAP will be included in the construction contract specifications. This will obligate the contractor to implement the mitigation measures identified in the MAP that relate to contractor responsibilities during construction and post-construction.

If you have general questions about the project, contact the Project Manager, Amanda Williams at 360-619-6634 or amloran@bpa.gov.

If you have any questions about the MAP, contact the project environmental lead, Katey Grange at 503-230-4047 or kcgrange@bpa.gov

If you have questions about the MAP during construction or post-construction, contact the environmental lead for project implementation, Aaron Siemers at 503-230-3078 or acsiemers@bpa.gov or Fred Walasavage at 541-296-3615, ext. 181 or fwalasavage@bpa.gov.

This MAP may be amended if revisions are needed due to new information or if there are any significant project changes.

CONSULTATION RELATED TO MITIGATION MEASURES

BPA evaluated the potential project impacts to species listed under Section 7 of the Endangered Species Act. No adverse impacts are expected to occur to any federally-listed threatened or endangered species or their habitat. Implementation of the mitigation measures listed below will further reduce the possibility of impacts to habitat. A no effect memo is on file at BPA that documents the lack of project-related impacts to all species listed for the subject counties, with

the exception of northern spotted owl. BPA determined in a biological assessment that was submitted in July 2016, and USFWS concurred in August 2016, that the project would not likely to adversely affect northern spotted owl.

BPA consulted with the Oregon State Historic Preservation Office (SHPO), Confederated Tribes of the Grand Ronde, Confederated Tribes of Warm Springs Reservation of Oregon, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Umatilla Indian Reservation, the Nez Perce Tribe of Idaho, Burns Paiute Tribe, Confederated Tribes of the Siletz, the Cowlitz Indian Tribe, Oregon Department of Parks and Recreation (Oregon State Parks) and US Forest Service under Section 106 of the National Historic Preservation Act. On March 5, 2014, BPA initiated consultation with all parties. A cultural resource survey was conducted to identify historic properties in the area of potential effect (APE). Based on the results of these surveys, BPA made a finding of adverse effect on cultural properties in November 2015. BPA, in coordination with Oregon SHPO, Advisory Council on Historic Preservation, Oregon State Parks, and US Forest Service developed a Memorandum of Agreement for project impacts to cultural resources that was signed by parties on May 30, 2018.

The installation of project culverts and fords and temporary use of a wetland area may require Pre-Construction Notification under Section 404 Clean Water Act and Section 401 Certification. BPA is coordinating with U.S. Army Corps of Engineers and Oregon Department of State Lands regarding the need for Section 404 permitting and Section 401 Certification. The mitigation provided below would avoid or minimize potential effects on waters of the United States.

MITIGATION MEASURES

The mitigation measures in Table 1 have been identified to reduce potential impacts to environmental resources from the project.

Table 1. Mitigation Action Plan

Measure	Land Use and Transportation	Recreation	Geology and Soils	Vegetation	Waterways and Water Quality	Wetland and Floodplains	Fish and Wildlife	Visual Quality	Air Quality and Greenhouse Gases	Socioeconomics and Public Services	Cultural Resources	Noise, Public Health and Safety
Compensate landowners at fair market value for any new land rights acquired for access road easements.	•									•		
Plan and conduct construction activities to minimize temporary disturbance, displacement of crops, and interference with agricultural activities.	•											
Compensate landowners for damage to property or crops,	•									•		

Table 1. Mitigation Action Plan

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Measure	Land Use and Transportation	Recreation	Geology and Soils	Vegetation	Waterways and Water Quality	Wetland and Floodplains	Fish and Wildlife	Visual Quality	Air Quality and Greenhouse Gases	Socioeconomics and Public Services	Cultural Resources	Noise, Public Health and Safety
as appropriate.												
Contact and provide a schedule of construction activities to all potentially affected landowners and managers. Coordinate with individual landowners to ensure that access roads and gates and construction and maintenance activities would minimize disruptions to commercial and recreational operations.	•									•		•
Restore compacted soils in agricultural areas as close as possible to pre-construction conditions.	•		•									
Remove and stockpile topsoil separately in croplands. Where backfill is used around pole structures, cover in native topsoil to the extent possible. Use stockpiled topsoil for site contouring and restoration.	•		•	•								
Revegetate disturbed areas after construction, with the exception of areas required to remain clear of vegetation to ensure the safety of the transmission line and access to structures.	•		•	•				•				
Develop a SWPPP that requires the use of erosion control BMPs, such as silt fencing, wood wattles, mulching, and revegetation, before and during ground-disturbing activities as much as practical to limit erosion off site and into sensitive areas (i.e., wetlands, riparian areas, culturally sensitive areas, streams) and the spread of noxious weeds.	•		•	•	•	•	•					
Delineate construction limits within 100 feet of streams, or the National Scenic Area buffer width, whichever is greater, with a sediment fence, straw	•		•	•	•	•	•					

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wattles, or a similarly approved method to eliminate sediment discharge into waterways. Leave erosion and sediment control devices in place until all disturbed sites are revegetated and erosion potential has returned to pre-project conditions.												
Inspect seeded sites to verify adequate growth and reseed or implement contingency measures, as needed.	•		•	•	•	•	•					
Conduct noise-generating construction activities only during daytime hours (i.e., between the hours of 7:00 a.m. to 5:00 p.m., Monday to Friday), to the extent possible. Limit construction activities within 0.5 mile of overnight use recreation facilities to weekdays between 8 a.m. and 5 p.m.	•	•					•					•
Ensure that access to recreation sites (campgrounds, trails/trailheads, day use areas) is maintained.	•	•										
Avoid trail closures unless necessary to maintain public safety. If closures are necessary, work with the land manager to temporarily reroute trails, if possible, and provide appropriate signage and notification in advance of trail closures.		•										
Develop a plan that outlines coordination of construction activities and timing with the U.S. Forest Service, Oregon State Parks, Hood River County Forestry Department, and special event coordinators to ensure that recreationists are minimally affected and interpretive activities at		•								•		

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campgrounds and special events are not affected.												
Ensure that access to the Pacific Crest Trail is maintained at all times and that a reroute of the trail around construction activities is provided (likely via other trails that provide access to the Pacific Crest Trail) if closures last longer than 2 hours, and coordinate with the U.S. Forest Service and the Pacific Crest Trail Association to ensure appropriate noticing and signing of any trail reroutes.		•										
Employ flaggers when public trails are temporarily closed for construction crossings.		•										•
Coordinate construction activities and timing with management of the Indian Creek Golf Course to minimize impacts on golfers.		•								•		
Develop a plan to coordinate the routing and scheduling of construction traffic with the Oregon Department of Transportation (ODOT), the U.S. Forest Service, Oregon State Parks, and county/municipal road staff. Address the following activities in the plan: • Use of traffic-control flaggers and posting of signs warning of construction activity and merging traffic for short interruptions of traffic during construction. • Coordination with emergency responders (law enforcement, fire,	•	•										•

Table 1. Mitigation Action Plan

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Measure	Land Use and Transportation	Recreation	Geology and Soils	Vegetation	Waterways and Water Quality	Wetland and Floodplains	Fish and Wildlife	Visual Quality	Air Quality and Greenhouse Gases	Socioeconomics and Public Services	Cultural Resources	Noise, Public Health and Safety
and emergency medical services) regarding road/lane closures to ensure continued service.												
Avoid and minimize construction disturbance areas on steep or unstable slopes, if possible.			•					•				
Conduct peak construction activities during the dry season, as much as possible, to minimize erosion and soil compaction. Do not conduct construction activities in unstable soil conditions, such as during or after a large rain or snowmelt event.			•		•	•	•					
Repair existing access roads that show signs of slumping or erosion.	•		•									
Retain existing low-growing vegetation where possible, and minimize the use of clearing/grubbing to preserve the roots of these plants.			•	•								
Locate material storage and temporary staging areas in flat, previously disturbed, or graveled sites outside of sensitive areas (i.e., wetlands, riparian areas and reserves, culturally sensitive areas, streams)to minimize soil and vegetation disturbance, where practicable.			•		•							
Use local rock sources for road construction where practicable.			•									
Limit leaching of PCP treatment chemicals from poles stored in staging areas into surrounding soils.			•	•	•	•	•					•
Prepare a site-specific Public Safety Plan to address measures to ensure public safety from landslide and			•									•

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rockfall risks generated during construction. The plan should address measures to take in design and construction to minimize slope failure from project-generated landslide and rockfall if geotechnical investigations indicate high levels of risk or new landslides or rockfall occur during construction.												
Develop and implement a blasting plan that identifies blasting procedures such as safety, use, storage, and transportation of explosives where blasting is needed, if necessary. The blasting plan would specify the locations where blasting is needed and require the use of a registered licensed blaster who would be required to secure all necessary permits and comply with regulatory requirements in connection with the transportation, storage, and use of explosives, and blast vibration limits for nearby structures, utilities, and wildlife.			•									•
Clearly identify sensitive areas (e.g., wetlands, riparian areas, culturally sensitive areas, streams, etc.) prior to construction so that construction crews can avoid unintentional impacts on these areas.				•		•	•					
Clearly mark trees identified for removal. Minimize the construction area				•								
to the extent practicable within native plant communities and sensitive habitats and riparian areas.				•		•	•					
Locate temporary access roads	•			•		•	•					

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and overland travel routes to avoid native plant communities and priority habitats, as practical.												
Avoid removing Oregon white oak trees to the extent possible. Should Oregon white oak require removal, work with the landowner or manager and ODFW to determine appropriate replanting techniques.				•			•					
Minimize the removal of mature trees at pulling/tensioning sites and along access roads to the extent practicable to minimize impacts on forest habitats.				•			•	•				
Clearly identify the location of long-bearded hawkweed and other sensitive plant populations and minimize construction work areas that would overlap populations.				•								
Conduct pre-disturbance surveys during spring and early summer before construction to determine whether populations of additional sensitive plant species are present in project impact areas.				•								
Coordinate with the U.S. Forest Service botanist for work on U.S. Forest Service-managed lands to allow for the relocation of sensitive plants that cannot be avoided during construction.				•								
Identify noxious weed infestations at construction sites and avoid these areas during construction, as practical.				•								
Minimize ground disturbance in proximity to existing noxious weed populations during construction.				•			•					

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Flag all weed populations that need to be avoided during construction				•	•	•	•					
Use water or compressed air and hand tools to remove seeds, roots and rhizomes from equipment used to move vegetation and topsoil before moving the equipment off site				•	•	•	•					
Provide vehicle and equipment washing stations for daily use before apparatus enters or leaves a project area with known weed infestation.				•	•	•	•					
Inspect equipment and vehicles for drips or leaks of fluids or fuel prior to first entry into project area. Continue inspections on a weekly basis. If drips or leaks are detected, promptly make repairs and then wash equipment or vehicle at an approved wash station.				•	٠	•	•					
Use weed-free straw, hydromulch, or similar ground cover for erosion control during construction and restoration activities in areas that cannot be immediately revegetated.			•	•	•		•					
Use weed-free rock when rock is required for construction activities.				•			•					
Treat noxious weeds to minimize their potential to colonize disturbed areas. Design treatment programs to avoid adverse effects on nontarget native plant species, particularly sensitive plant species and native populations in sensitive habitats.				•			•					
Avoid siting new structures and access roads within National Scenic Area stream buffers or Riparian Reserves on National	•	•	•	•	•	•						

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Forest System lands during the design process, where possible. Where this is not possible, restrict structure work spaces to 50 feet by 50 feet per structure to the extent possible.												
Identify stream and stream buffer locations to restrict vehicles and equipment to designated routes and workspaces in these areas.	•	•	•	•	•	•						
Locate pulling/tensioning sites at least 100 feet away from surface waters, where possible.					•		•					
Design and construct access roads to minimize drainage and erosion from the road surface directly into surface waters; size and space cross drains and water bars properly to accommodate flows and direct sediment-laden waters into vegetated areas.	•	•	•		•	٠	•					
Review required BMPs, water quality mitigation measures, and other permit requirements with construction contractors and inspectors during a preconstruction meeting covering environmental requirements.					•							
Prohibit side casting of road grading materials within 100 feet of streams.	•	•			•		•					
Conduct in-water work during the low flow period (in-water work window) in both fishbearing and non-fish-bearing streams to reduce turbidity.	•	•			•		•					
If water is present in Dry or Harphan Creeks at the time the fords are constructed, provide downstream fish passage and isolate the in-water work area. Perform fish salvage within the isolation area before in-water							•					

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construction activities are initiated.												
Restore stream channel bed and banks after in-water work if necessary.			•	•	•		•					
Reseed and recontour disturbed areas after construction activities are complete, at the appropriate time period for germination, with a native seed mix, a seed mix recommended by ODFW, or as agreed upon with landowners/land managers for use on their property.			•	•	•	•	•	•				
Revegetate and recontour disturbed areas in stream buffers following specific revegetation guidelines in permits; reseed pastures with an appropriate seed mix, as determined through discussions with the landowner.			•	•	•		•	•				
Prepare and implement Spill Prevention and Response Procedures (SPRP) to contain potentially leaching preservatives, petroleum products, or hazardous materials. In the event of a spill, immediately contain the spill, eliminate the source, and deploy appropriate measures to clean and dispose of spilled materials in accordance with the SPRP and federal, state, and local regulations. Provide spill response kits at designated locations on the project site.			•		•	•	•					•
Restrict vehicle refueling and servicing to locations a minimum of 100 feet away from natural or human-made drainage conveyances (e.g., ditches, catch basins, ponds, wetlands, streams, and pipes),					•	•	•					

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National Scenic Area waterbody buffers, or Riparian Reserves (for National Forest System land), whichever is greater. Use pumps, funnels, absorbent pads, and drip pans when fueling or servicing vehicles.												
Reduce erosion at stream crossings with no culverts by installing stable drive-through fords and rolling dips.			•		•		•					
Identify active raptor nest sites by consulting with ODFW and/or the USFWS and conduct raptor nest surveys, if necessary, prior to construction. Avoid tree removal or construction work within a buffer around the active nest as identified for the specific species in <i>Guidelines for Raptor Conservation in the Western United States</i> (USFWS 2008) unless otherwise authorized by ODFW and/or the USFWS.							•					
Avoid blasting within 0.5 mile of active bald eagle, peregrine falcon, or other sensitive raptor species nests during the nesting period, unless otherwise authorized by ODFW and/or the USFWS.							•					

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If an active eagle, falcon, or other sensitive raptor nest is identified prior to construction, a 0.25 mile construction buffer from the nest for all work and 0.5 mile buffer for helicopter use would be maintained until the young have fledged, unless otherwise authorized by ODFW and/or the USFWS.							•					
Schedule tree removal (and other vegetation removal as much as possible) between September 15 and March 1 to minimize impacts on migratory birds. If tree clearing is needed outside of that time, conduct a pre-construction nesting bird survey prior to the tree removal. If active nests are found, do not remove trees until the young have fledged.							•					
Avoid snag and large tree removal to the extent possible. Leave small portions of cut and felled trees in upland areas as additional habitat/structure for wildlife where appropriate, if acceptable to the landowner/land manager, and not a fire risk.							•					
Top or trim danger trees to create snags where practical and not a hazard to other resources (e.g., recreational users, roads, structures, etc.).	•	•					•					
Conduct pre-construction biological surveys for Oregon slender salamander, Larch Mountain salamander, and American pika in all proposed work areas on cliffs and talus slopes; for red tree voles in areas where clumps of five or more trees would be removed; for aquatic mollusk and amphibians in areas where in-							•					

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water work is proposed; and for the northern spotted owl in suitable habitat. Surveys would be conducted by a qualified												
biologist. If surveys show no												
evidence of these special-status												
wildlife species, no additional conservation measures shall be												
required. If they are found,												
implement the following												
species-specific measures:												
Establish a 330-foot												
buffer zone around												
active pika breeding												
areas in talus fields as												
well as adjacent												
meadows that pikas												
use for foraging												
(Beever, pers. comm., U.S.Geologic												
Survey [USGS], Nov.												
14, 2014); the buffer												
should be maintained												
until the end of the												
breeding season												
(March to July).												
 Relocate identified 												
Larch Mountain and												
Oregon slender												
salamanders and												
establish a 25-foot												
radius buffer around identified breeding												
site in talus and moist												
microclimate												
features (e.g., down												
logs, rocks).												
Avoid construction activities in												
designated big game winter												
range that is outside of the												
influence of interstate and train							•					
development (0.25 mile) from												
December 1 to March 1 or as												
determined through consultation with ODFW.												
Prepare and implement a												
Fugitive Dust Control Plan.	•	•	•						•			•
Tabilive Dust Control Flan.	<u> </u>						<u> </u>	l				

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Encourage construction vehicles to travel at low speeds on access roads and construction sites to minimize dust.	•	•	•				•		•			•
Use staging areas based on proximity to active construction sites, to the extent feasible and practical, to minimize vehicle miles travelled between staging areas and construction sites.									•			
Site equipment staging areas away from sensitive receptors, such as residences and schools, to reduce health risk exposure to temporary increases in criteria pollutants and dust during equipment and vehicle operations.									•			•
Initiate discussions with local fire districts prior to construction and work with the districts and other appropriate emergency response entities to develop appropriate fire and emergency response plans.				•			•			•		•
Equip all vehicles with mufflers maintained in good operating condition.							•					•
Locate equipment as far away as practical from noisesensitive areas.												•
Comply with all fire safety laws, rules, and regulations of Oregon and prepare a Fire Prevention and Suppression Plan to meet BPA, local authority, and land manager requirements.				•						•		•
Obtain a permit for operation of power-driven machinery on forested lands from Oregon Department of Forestry and comply with fire prevention permit requirements.				•			•		•			•
Implement fire prevention												•

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measures including use of spark arrestors, water tenders, bulldozers, and a watch person to secure work areas at end of day if required.												
Minimize rockslide hazards during upslope activities, including the implementation of slope stabilization measures and installation of flow drainage materials prior to construction activities.			•		•							•
Develop and implement rockslide emergency response procedures for use in the event of rockslide.			•									•
Minimize vegetation clearing in areas visible to KVAs to the extent possible.								•				
Minimize extending and improving access roads in areas visible to KVAs to the extent practical.								•				
Use Permeon or a similar product to advance the weathering of fresh road cuts that expose light-colored rock in areas visible to KVAs.								•				

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Measure	Land Use and Transportation	Recreation	Geology and Soils	Vegetation	Waterways and Water Quality	Wetland and Floodplains	Fish and Wildlife	Visual Quality	Air Quality and Greenhouse Gases	Socioeconomics and Public Services	Cultural Resources	Noise, Public Health and Safety
Locate material and helicopter staging areas as close to construction sites as practicable to minimize travel distances between staging areas and work areas.									•			
Locate staging areas in previously disturbed, graveled, or paved areas to minimize soil and vegetation disturbance where practicable.			•	•	•				•			
Minimize mature tree clearing in pulling/tensioning work areas, as practical.				•			•		•			
Encourage the use of the proper size of equipment for the job to maximize energy efficiency.									•			
Use locally sourced materials and local disposal areas, as practical, to reduce vehicle travel distances.									•			
Conduct cultural resource consultation and investigations on previously unsurveyed areas prior to ground disturbance.											•	
Avoid siting access roads across historic properties during the design process, where possible.											•	
Minimize the size of construction disturbance areas and removal of vegetation near cultural resource sites, to the greatest extent possible. Limit construction near cultural site boundaries where possible.				•							•	
Explain cultural resource- related mitigation measures to construction contractors and inspectors, including field marking for avoidance, during preconstruction meetings. Depict cultural sites as "sensitive areas to be avoided" in construction documents and											•	
on construction maps.												

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Prepare and implement a mitigation plan for unavoidable adverse impacts on cultural resources eligible for listing in the National Register in consultation with the State Historic Preservation Offices (SHPOs), US Forest Service, and											•	
consulting Tribes. Implement an Inadvertent Discovery Plan for cultural material (e.g., structural remains, Euro-American artifacts, or tribal artifacts) that details construction crew member responsibilities for reporting in the event of a discovery of cultural material during construction; requires work to stop immediately and notification of local law enforcement officials (as required), appropriate BPA personnel, SHPOs, land managers, and affected Tribes if cultural resources or human remains are discovered during construction activities.											•	

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Implement an Inadvertent												
Discovery Plan for human												
remains, suspected human												
remains, or items suspected to												
be related to a human burial												
(i.e., funerary items, sacred												
objects, or objects of cultural												
patrimony) that follows the												
National Scenic Area												
Management Plan. This would												
include the following												
procedures:												
Halt activities. All												
survey, excavation,												
and construction												
activities shall cease.												
The human remains shall not be												
disturbed further.												
Notification. Local												
law enforcement												
official, the local												
government, the											•	
U.S. Forest Service,												
the Gorge Commission, and the												
Indian tribal												
governments shall												
be contacted												
immediately.												
Inspection. The												
county coroner, or												
appropriate official, shall inspect the												
remains at the												
project site and												
determine if they are												
prehistoric, historic,												
or modern.												
Representatives from the Indian												
tribal governments												
shall have an												
opportunity to												
monitor the												
inspection.												

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Jurisdiction. If the remains are modern, the appropriate law enforcement officials shall assume jurisdiction and the cultural resource protection process may conclude.												
• Treatment. In Oregon, prehistoric/historic remains of Native Americans shall generally be treated in accordance with the in accordance with the procedures set forth in ORS 97.740 to 97.760.												