DATE:  October 14, 2011

REPLY TO ATTN OF:  KEP-AMPN-2

SUBJECT:  Environmental Clearance Memorandum

TO:  Miroslava Rivera
      Realty Specialist – TERR-3

**Proposed Action:** Grant NoaNet permission to install aerial mounted fiber optic cables on existing Cowlitz County PUD poles at Bonneville Power Administration’s (BPA) Lexington Substation

**Budget Information:** N/A

**Categorical Exclusions Applied (from Subpart D, 10 C.F.R. Part 1021):**
B1.7 “Acquisition, installation, operation, and removal of communication systems…”
B4.7 “…burying fiber optic cabin in existing transmission line rights-of-way”

**Location:** Cowlitz County, Washington - Section 15, Township 8N, Range 2 W, WM

**Proposed by:** BPA

**Description of the Proposed Action:** BPA is proposing to give NoaNet permission to install aerial mounted fiber optic cables on existing Cowlitz County PUD poles that are located on BPA fee-owned property. The existing poles are structurally adequate to hold the new NoaNet fibers, so they will require no new guying or other upgrades. At Cowlitz County PUD Pole # P-250A, the aerial fiber installation will transition to buried fiber installation through two new 4” PVC risers and innerducts that will proceed outside of and across the southern entrance access road to an existing BPA vault (LEXI 3CV). From the existing LEXI 3CV vault, fiber will be pulled through existing innerducts to existing vaults LEXI 2CV and LEXI 1CV, then through existing innerducts to the NoaNet regeneration facility located on the BPA Lexington Substation property. The trench to install buried conduit from Pole 250A to LEXI 3CV will be backfilled with native excavated material and restored with native grasses upon completion of the project. NoaNet’s contractor will use a bucket truck for aerial fiber installation and a trencher and fiber-puller for buried conduit and fiber installation.

**Findings:** BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, April 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a) (1)] to other action with potentially significant impacts, is not related to other proposed actions with cumulatively significant impact [40 C.F.R. 1508(a) (2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of
applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act - excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted release, or (iv) adversely affect environmentally sensitive resources.

The proposal will not affect any listed threatened or endangered species, or critical habitat under the Endangered Species Act, or Essential Fish Habitat under the Magnuson-Stevens Fishery Conservation and Management Act, or historic properties under the National Historic Preservation Act.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Joseph C. Sharpe, for:
Elaine Stratton
Environmental Protection Specialist

Concur: /s/ Katherine S. Pierce Date: October 14, 2011
Katherine S. Pierce
NEPA Compliance Officer

Attachments:
Environmental Checklist for Categorical Exclusions
Provisions
Environmental Checklist for Categorical Exclusions

Name of Proposed Project: NoaNet install of fiber at Lexington Substation

Work Order #: N/A

This project has been found to not adversely affect the following environmentally sensitive resources, laws, and regulations:

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Adverse Effect</th>
<th>No Adverse Effect With Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>2. T &amp; E Species, or their habitat(s)</td>
<td>X</td>
<td></td>
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<tr>
<td>3. Floodplains or wetlands</td>
<td>X</td>
<td></td>
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<tr>
<td>4. Areas of special designation</td>
<td>X</td>
<td></td>
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<td>5. Health &amp; safety</td>
<td>X</td>
<td></td>
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<tr>
<td>6. Prime agricultural lands</td>
<td>X</td>
<td></td>
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<td>7. Special sources of water</td>
<td>X</td>
<td></td>
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<tr>
<td>8. Consistency with state and local laws and regulations</td>
<td>X</td>
<td></td>
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<td>9. Pollution control at Federal facilities</td>
<td>X</td>
<td></td>
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<tr>
<td>10. Other</td>
<td></td>
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List supporting documentation attached (if needed):
No supporting documentation attached
Provisions

This categorical exclusion will meet the following provisions:

Cultural Resources:

1. Should archaeological materials be unexpectedly encountered during project activities, the following actions should be taken:
   - Stop work and immediately notify the COTR and a qualified archaeologist. In addition, all concerned Tribes and appropriate county, state, federal agencies should be notified.
   - Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering.
   - Take reasonable steps to ensure the confidentiality of the discovery site.
   - Take reasonable steps to restrict access to the site of discovery.

Vegetation Protection and Noxious Weeds:

2. Restrict construction activities to the area needed to work effectively. Construction crews will be instructed to restrict vehicles to designated areas and existing roads as much as possible.

3. Designated areas will be used to store equipment and supplies. The contractor will follow applicable state and federal regulations to protect plant communities.

4. After construction, disturbed areas not needed for ongoing access or maintenance will be promptly reseeded with native species where possible.

5. Seed mix for revegetation will contain a mixture of the common native bunchgrasses and dryland species present in the Project area. Native seed is commercially available for this area.

6. Do not spread noxious weed seeds:
   - Certify in writing that all vehicles, equipment, and machinery are free of all weeds including seeds before moving the equipment into the construction area. The COTR will inspect vehicles prior to bringing them on site.
   - When an area contaminated by weeds is encountered on, or off of, the construction site, use caution to prevent the spreading of weeds to other areas. This may include cleaning the equipment with high-pressure water prior to moving from one work site to another, or installing wheel washes. Notify the COTR as to the location of the noxious weeds.

7. Use only weed-free materials, or inert materials for mulching and for erosion control.
Erosion Control and Land Use:

8. Require dust abatement on road and construction site, if necessary.
9. Appropriate erosion and sediment control best management practices will be utilized for the protection of water resources.
10. Provide a schedule of construction activities to all landowners/agencies along the corridor that could be affected by construction.
11. Plan and schedule construction activities, when practical, to minimize temporary disturbance, displacement of crops, and interference with farming activities.
12. Keep gates in as found condition (opened or closed). Coordinate construction sequence with landowner so that livestock may be moved if necessary.

Public Health and Safety:

13. Limit construction to daytime hours for noise abatement.
14. No equipment with un-muffled exhaust is allowed. Fit all equipment with sound-control devices that are as effective as the original equipment.
15. Should contaminated media be unexpectedly encountered during construction of the project, stop work and notify the COTR. Contaminated media include materials that are potentially harmful to the environment or human health and safety. Work will proceed only after measures approved by the ODEQ are put in place to prevent the spread of contaminated materials and protect the health and safety of workers.
16. Equip vehicles with fire suppression equipment, including a shovel, fire extinguisher, and bladder or water supply.
17. Equip construction vehicles with spill containment kits able to respond to construction related spills.