RECLAMATION
Managing Water in the West

Siphon Power Property, Central Oregon Canal Piping Project, Central Oregon Irrigation District WaterSMART Grant

FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT

Deschutes Project, Oregon
Pacific-Northwest Region
PN EA 17-11
PN FONSI 17-11

U.S. Department of the Interior
Bureau of Reclamation
Columbia-Cascades Area Office
Yakima, Washington

January 2018

MISSION STATEMENTS

U.S. Department of the Interior

Protecting America's Great Outdoors and Powering Our Future

The Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future.

Bureau of Reclamation

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Siphon Power Property, Central Oregon Canal Piping Project, Central Oregon Irrigation District WaterSMART Grant

FINDING OF NO SIGNIFICANT IMPACT

Decision: It is our decision to authorize the Preferred Alternative, Alternative B, to provide funding toward the construction of the Siphon Power Property Canal (SPPC) Piping Project. The SPPC Piping Project will be funded through the Bureau of Reclamation's WaterSMART (Sustain and Manage America's Resources for Tomorrow) Water and Energy Efficiency Grant Program (WaterSMART Program). The purpose of the proposed action is to conserve limited surface water in the Deschutes River Basin (DRB). The need for the Preferred Alternative is to pipe the 3,000-foot section of the Central Oregon Canal (COC) to conserve an estimated 5 cfs during the irrigation season and augment instream flows.

BACKGROUND

More than 100 years ago, settlers of Central Oregon built 627 miles of basalt-lined canals to serve irrigators. While these canals were vital to the settlement and development of the region, they lose approximately 50 percent water to seepage. Irrigation districts using the open canals must withdraw nearly double the water needed to compensate for the seepage loss. The eight irrigation districts that serve Central Oregon have undertaken major capital updates to their systems to reduce seepage loss by converting open canals to piping. The piping contributes to major water savings and instream flow improvements in the DRB.

Since 2005, Central Oregon Irrigation District (COID) has initiated several multipurpose projects, including the Juniper Ridge hydroelectric project and Cline Falls Dam removal. These projects have returned 25 cfs of senior water rights, which are permanently protected instream for the benefit of fish and wildlife. The SPPC Piping Project is COID's latest piping initiative to conserve water.

FINDINGS

Reclamation prepared an environmental assessment (EA) analyzing the alternative to provide funding for COID's SPPC Piping Project. In addition, Reclamation analyzed a No Action alternative to serve as a baseline comparison. The proposed Federal action is to provide funding

for COID's SPPC Piping Project through Reclamation's WaterSMART Program and is identified as the Preferred Alternative.

Under the Preferred Alternative, Reclamation will provide funding for COID's piping of 3,000 feet of the Central Oregon Canal (COC) to reduce water seepage and evaporation loss. Reclamation has found that the Preferred Alternative is not a major Federal action that would significantly affect the quality of the human environment; therefore, an environmental impact statement is not required.

The environmental impacts of constructing the Preferred Alternative are not significant for the following reasons:

- The Preferred Alternative is consistent with the Deschutes Project Congressional Authorizations, Acts, Federal, State and local laws and will fully achieve its overall purpose.
- Water quality impacts during construction would be minor and short term, minimized by best management practices (BMPs), process technologies, and project timing.
- Air quality impacts during construction would be minor and short term, mitigated by BMPs, process technologies, and project timing.
- Noise effects during construction would be minimized by timing of high-decibel operations and process technologies such as restricted hours of construction and use of well-muffled equipment.
- There are no wetlands in the project area; therefore, no effects to wetlands will occur with project implementation. Vegetation impacts will be minor; impacts will be minimized by specified seedbed preparation and seeding.
- The Preferred Alternative will have no adverse effect on Endangered Species Act (ESA)-listed species, because no listed species occur in the project area. The piping project will create only short-term, minor potential effects on non-listed wildlife, and no effect on fish will occur with project implementation.
- Under a memorandum of agreement with the Oregon State Historic Preservation Office (SHPO) and Reclamation, the Preferred Alternative would result in an adverse effect to the COC. This adverse effect will be mitigated by COID and the Bend Parks and Recreation Department's (BPRD) continued support and development of the Central Oregon Historic Trail.
- No Indian sacred sites were identified in the project area; therefore, the Preferred Alternative will not affect the physical integrity of Indian sacred sites, and access to or ceremonial use of such sites will not be restricted.
- There are no Indian Trust Assets in the project area; therefore, the Preferred Alternative will not affect any Indian Trust Assets.
- Providing funding toward the SPPC Piping Project will not disproportionately affect minorities or low-income populations and communities, since there will be no substantive change in employment, land use, or irrigated agriculture.

Finding of No Significant Impact (FONSI): Based on the analysis of potential environmental impacts presented in the attached EA, Reclamation has determined that the Preferred Alternative will have no significant effect on the human environment or natural and cultural resources. Reclamation concludes that preparation of an environmental impact statement is not required, and this EA and FONSI satisfy the requirements of NEPA.

RECOMMENDED:

Candace McKinley
Environmental Program Manager
Yakima, Washington

1/3/18
Date

APPROVED:

for Dawn Wiedmeier
Columbia–Cascades Area Manager
Yakima, Washington

1/3/18
Date

RECLAMATION
Managing Water in the West

Siphon Power Property, Central Oregon Canal Piping Project, Central Oregon Irrigation District WaterSMART Grant

FINAL ENVIRONMENTAL ASSESSMENT

Deschutes Project, Oregon

Pacific Northwest Region
PN EA 17-11

U.S. Department of the Interior
Bureau of Reclamation
Columbia-Cascades Area Office
Yakima, Washington

January 2018

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ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
BPRD	Bend Parks and Recreation Department
BiOp	Biological Opinion
CFR	Code of Federal Regulations
cfs	cubic feet per second
COC	Central Oregon Canal
COID	Central Oregon Irrigation District
DBBC	Deschutes Basin Board of Control
DBHCP	Deschutes Basin Habitat Conservation Plan
DRB	Deschutes River Basin
EA	Environmental Assessment
ESA	Endangered Species Act
FONSI	Finding of No Significant Impact
HAER	Historic American Engineering Record
ITA	Indian Trust Assets
MOA	Memorandum of Agreement
MPD	Multiple Property Document
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
OAR	Oregon Administrative Rules
PBC	Pilot Butte Canal
Reclamation	Bureau of Reclamation
SHPO	Oregon State Historic Preservation Office
SPPC	Siphon Power Property Canal
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service

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Siphon Power Property, Central Oregon Canal Piping Project; Central Oregon Irrigation District WaterSMART Grant

ENVIRONMENTAL ASSESSMENT

PN EA 17-11

Chapter 1. Introduction

More than 100 years ago, Central Oregon settlers built 627 miles of basalt-lined canals for irrigation purposes. While these canals were vital to the development of the region, irrigation districts that use these canals to serve their customers must withdraw nearly double the water needed to compensate for the seepage loss. Eight Central Oregon irrigation districts, including the Central Oregon Irrigation District (COID) have made major capital expenditures to replace these unlined canals with pipes. Not only does pipe installation save water and improve instream flows in the Deschutes River Basin (DRB), it also supports energy efficiency by supporting pressurized water delivery.

Since 2005, COID has initiated several multipurpose projects including the Juniper Ridge hydroelectric project and the Cline Falls Dam removal. These projects have returned 25 cubic-feet-per-second (cfs) of senior water rights, which are permanently protected to benefit fish and wildlife. The Siphon Power Property Canal (SPPC) Piping Project is COID's latest piping initiative to conserve water (www.coid.org).

1.1 Background

In the DRB, eight irrigation districts serve their customers by diverting water from the Deschutes River and its tributaries. Collectively, these districts deliver water to more than 150,000 acres of land through approximately 627 miles of canals and laterals. The COID boundary extends throughout Redmond, Tumalo, and Bend, Oregon (See Figure 1).

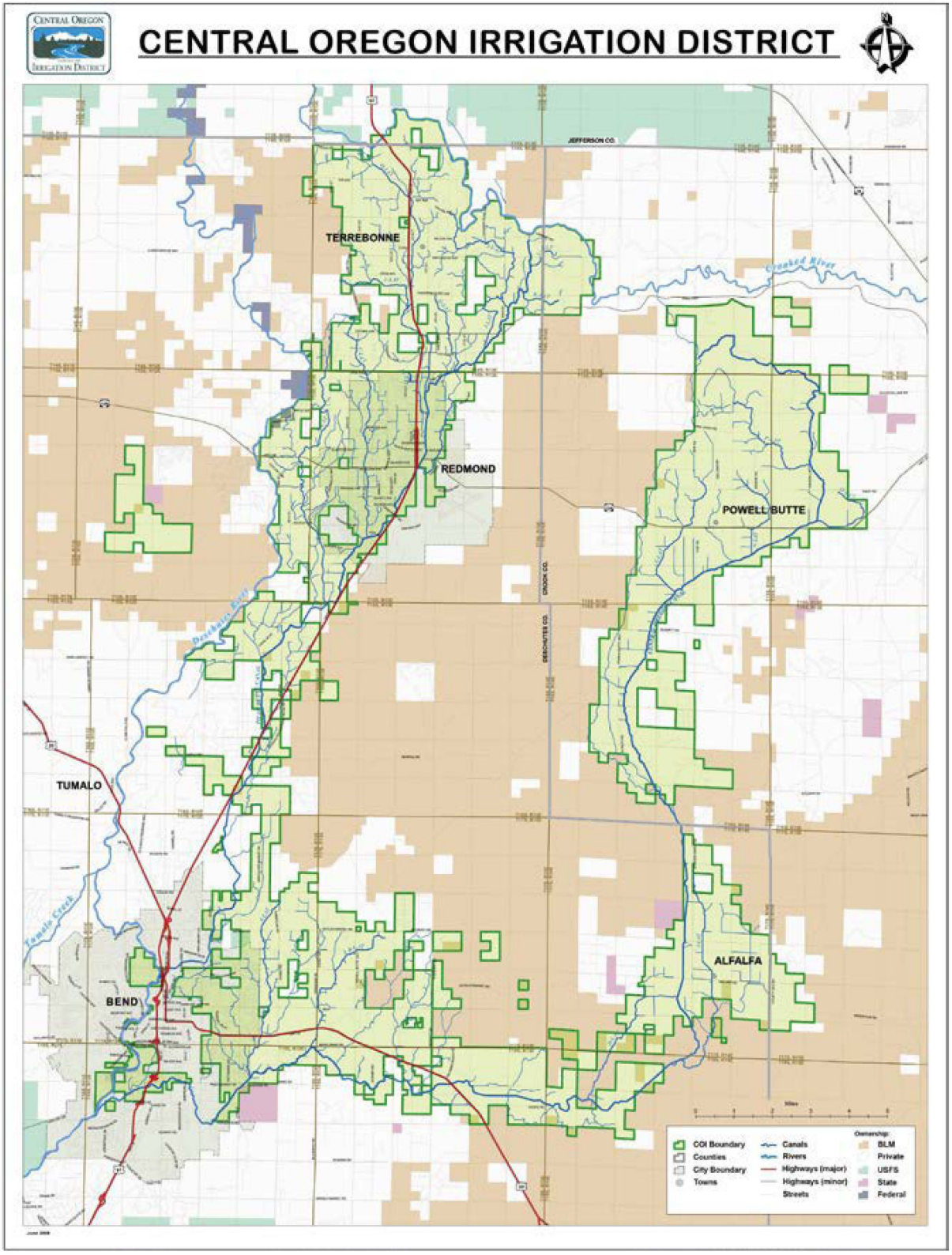

Figure 1. COID's boundaries are outlined by green lines.

COID operates two main canals that divert water from the Deschutes River. The Central Oregon Canal (COC) serves the areas of Alfalfa, Bend, and Powell Butte; and the Pilot Butte Canal (PBC) serves the areas of Bend, Redmond, and Terrebonne. Both the COC and the PBC are mostly unlined canals that carry water through heavily fractured basalt. Although COID has made significant capital investments toward piping the canals, nearly 160 miles of canals remain open and warrant piping improvements (COID 2016).

1.2 Project Location

The proposed piping project is located in Deschutes County, Oregon, on land owned by COID. The SPPC Piping Project involves a 3,000-foot-long open segment of the COC in Bend, Oregon, between the headworks at the end of the siphon pipeline and the concrete bridge that carries Brookswood Boulevard over the canal

The COC conveys water to 25,257 acres of land with an estimated seepage loss of 32,127 acre-feet. Water in the COC is diverted from the Deschutes River at a point about 4.5 miles south (upstream) of downtown Bend into the COC, part of a system of canals (see Figure 2) of varying widths that provide water for irrigation and other uses to the east toward Powell Butte (COID 2016).

1.3 Purpose and Need

The U.S. Department of the Interior Bureau of Reclamation proposes to provide funding for COID's SPPC Piping Project through the Reclamation's WaterSMART (Sustain and Manage American's Resources for Tomorrow) Water and Energy Efficiency Grants Program (WaterSMART Program). The purpose of project is to conserve limited surface water in the DRB. The need for the proposed action is to pipe a 3,000-foot section of the COC to conserve an estimated 5 cfs during the irrigation season and augment instream flows.

1.4 Proposed Action

Reclamation would provide funding toward COID's SPPC Piping Project through the Department of Interior's WaterSMART Water and Energy Efficiently Grants Program. COID would pipe approximately 3,000 linear feet of open canal from COID's siphon power plant forebay to Brookswood Boulevard (see Figure 2).

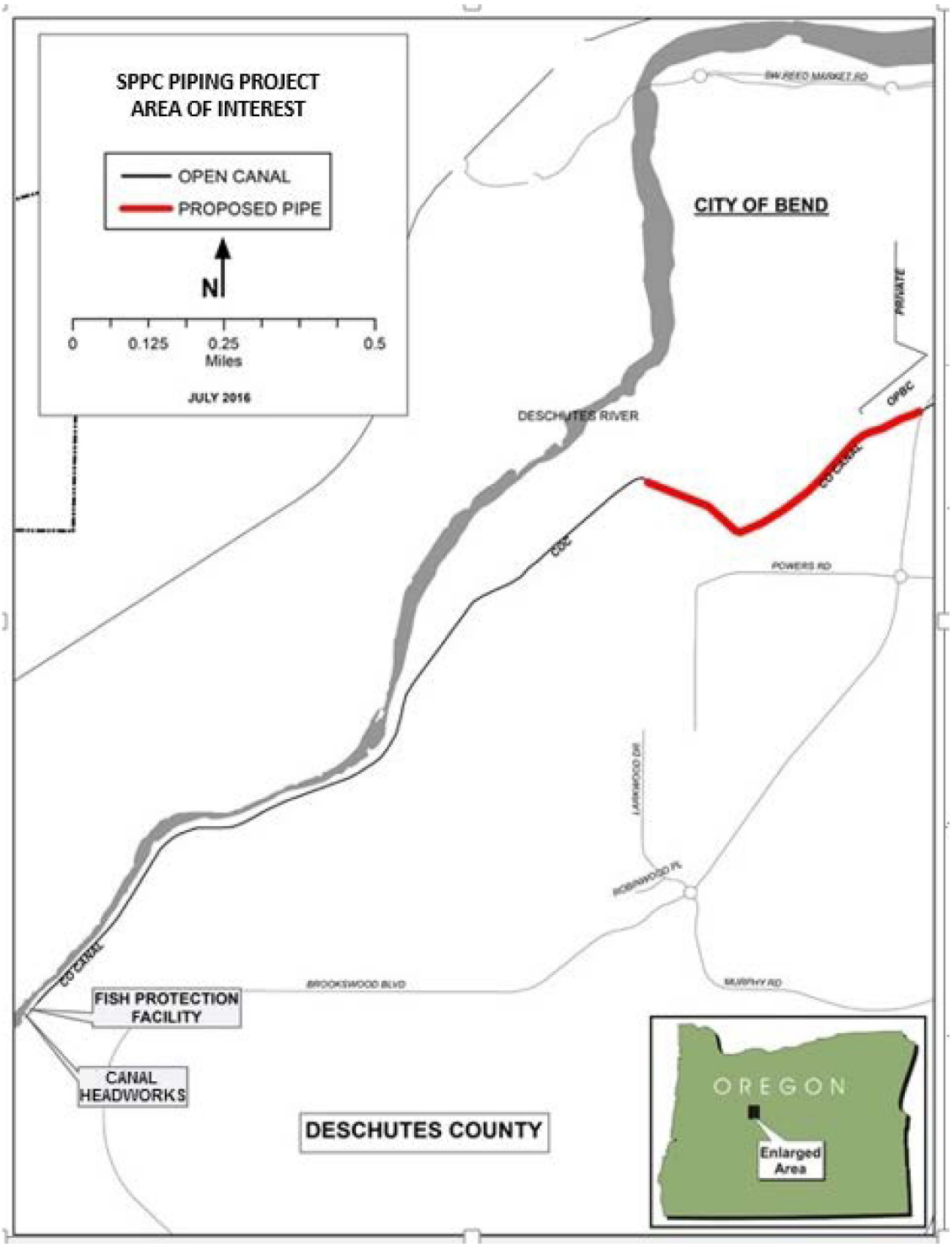

Figure 2. SPPC Piping Project Map. The 3,000-foot pipeline to replace open canal in the City of Bend, Oregon, is indicated in red (COID 2016).

1.5 Authorities and Related Laws

The Deschutes Project was authorized by a finding of feasibility by the Secretary of the Interior dated September 24, 1937, approved by the President on November 1, 1937, pursuant to Section 4 of the Act of June 25, 1910 (36 Stat. 836) and subsection B of section 4 of the Act of December 5, 1924 (43 Stat. 702). Various laws, Executive Orders, and Secretarial Orders that apply to the proposed action are summarized below.

National Environmental Policy Act

Reclamation is responsible for determining if the proposed action might have significant effects to the human environment under the National Environmental Policy Act (NEPA). If Reclamation determines that effects are not significant, a finding of no significant impact (FONSI) will be prepared. A FONSI would allow Reclamation to proceed with the proposed action without preparation of an environmental impact statement.

Endangered Species Act

The Endangered Species Act (ESA) requires Federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. Section 7 of the ESA (16 United States Code (USC) Section 1536[a][2]) requires all Federal agencies to consult with the National Marine Fisheries Service for marine and anadromous species, or the U.S. Fish & Wildlife Service (USFWS) for freshwater and wildlife species, if an agency is proposing an action that may affect listed species or their designated habitat. If such species may be present, the Federal agency must conduct a biological assessment (BA) for analyzing the potential effects of the project on listed species and critical habitat to establish and justify an effect determination. Agencies must use their authorities to conserve listed species and ensure their actions do not jeopardize the continued existence of listed species.

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 (16 USC 470, Public Law 95-515) requires that Federal agencies complete inventories and site evaluation actions to identify historic resources that may be eligible for inclusion on the National Register of Historic Places (National Register) and ensure those resources, “are not inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly.” Regulations titled, “Protection of Historic Properties,” Code of Federal Regulations (CFR) 36-800 define the process for implementing requirements of the NHPA, including consultation with the appropriate State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP).

Clean Water Act

The Clean Water Act (CWA) employs a variety of regulatory and nonregulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters so that they can support the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water.

Executive Order 13007 - Indian Sacred Sites

Executive Order 13007, dated May 24, 1996, instructs Federal agencies to promote accommodation of access to and protect the physical integrity of American Indian sacred sites. A “sacred site” is a specific, discrete, and narrowly delineated location on Federal land. An Indian Tribe or an Indian individual determined to be an appropriately authoritative representative of an Indian religion must identify a site as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion, provided that the Tribe or authoritative representative has informed the agency of the existence of such a site.

Secretarial Order 3175 - Responsibilities for Indian Trust Assets

Indian Trust Assets (ITAs) are legal interests in property held in trust by the United States with the Secretary of the Interior acting as trust for Indian Tribes or Indian individuals. Examples of ITAs are lands, minerals, hunting and fishing rights, and water rights. In many cases, ITAs are on-reservation; however, they may be found off-reservation.

The United States has an Indian trust responsibility to protect and maintain rights reserved by or granted to Indian Tribes or Indian individuals by treaties, statutes, and executive orders. These rights are sometimes further interpreted through court decisions and regulations. This trust responsibility requires that officials from Federal agencies, including Reclamation, to take all reasonable actions necessary to protect ITAs when administering programs under their control.

WaterSMART Program

The WaterSMART Program is authorized under Section 9504(a) of the Secure Water Act, Title IX, Subtitle F, of the Omnibus Public Land Management Act of 2009 (Public Law 111-11 42 USC 1036). Section 4(a) of Secretarial Order 3297 provides that the U.S. Department of the Interior will coordinate across agencies and programs to implement water sustainability efforts. Secretarial Order 3297 also lists specific programs, including the Reclamation WaterSMART Program.

Executive Order 12898: Environmental Justice

Executive Order 12898 dated February 11, 1994, instructs Federal agencies, to the greatest extent practicable and permitted by law, to make achieving environmental justice part of its mission by addressing, as appropriate, disproportionately high and adverse human health or environmental effects on minority and low-income populations. Environmental justice means the fair treatment of people of all races, income, and cultures with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment implies that no person or group of people should shoulder a disproportionate share of negative environmental impacts resulting from the execution of environmental programs.

Chapter 2. Alternatives

2.1 Alternative A - No Action

Under Alternative A Reclamation would not fund the SPPC Piping Project; therefore, water conservation and efficiencies would not be achieved. Reclamation's practice is to include the No Action alternative because it provides an appropriate basis by which all other alternatives are compared.

2.2 Alternative B - Preferred Alternative

Under Alternative B, Reclamation would fund the SPPC Piping Project under its WaterSMART Program. COID would install 3,000 feet of welded, spiral wound, polyurethane-coated and lined, 120-inch-diameter steel pipe. The pipe would be buried and backfilled using standard motorized earth-moving equipment. Some shallow controlled blasting may be required to support construction excavations. COID would place all piping and appurtenances within the existing canal prism and tie into the existing power plant forebay. A new outlet structure would be constructed of reinforced concrete just downstream of Brookswood Boulevard (see Figure 3 and Figure 4). The proposed design is consistent with COID's existing operation and maintenance systems. Vegetation areas disturbed by construction would be reseeded. Project construction, estimated to take about 3 months, would occur during the non-irrigation season and would be completed in spring 2018. Project implementation would result in conserving 5 cfs instream water.

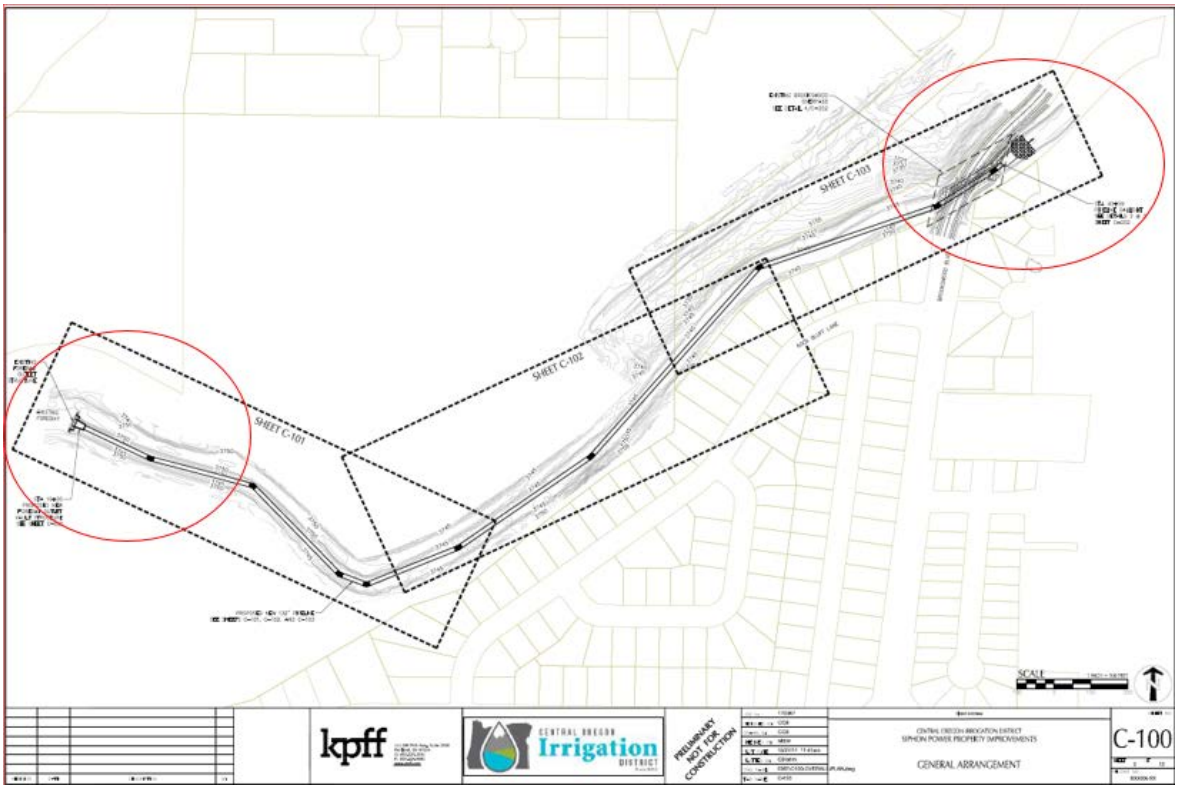

Figure 3. Pipeline layout preliminary design. Red-circled pipeline forebay and outlet are detailed in Figure 4 below.

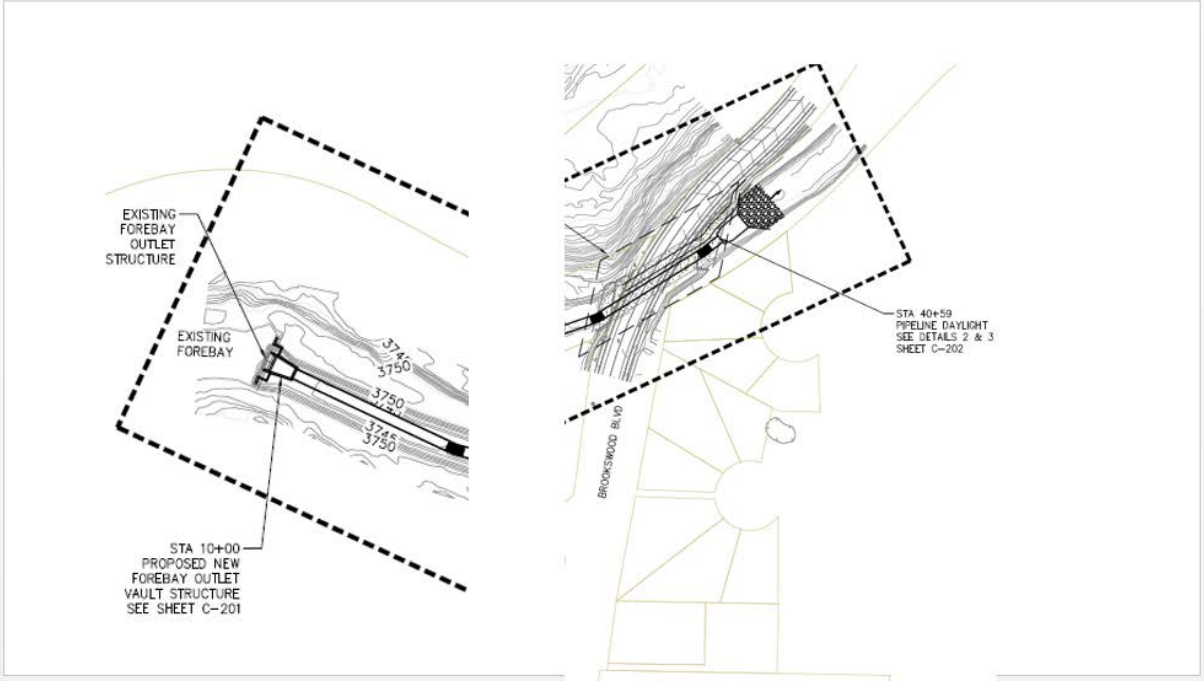

Figure 4. Detail of forebay and pipeline outlet preliminary design (COID 2016).

Chapter 3. Affected Environment and Environmental Consequences

This chapter describes the existing environment in the project area and evaluates the environmental impacts of implementing the SPPC Piping Project.

The following resource areas will not be evaluated in this environmental assessment (EA) because the proposed action would not have a discernable impact on them:

- **Wild and Scenic Rivers.** There are no such resources in the project area; therefore, no affect would occur with project construction.
- **Recreation.** Existing components of the Bend Urban Trail is distant from the project, and project construction would not interrupt recreational activities.
- **Climate.** There would be no discernable change in climate characteristics with implementation of the SPPC Piping Project.
- **Threatened and Endangered Species.** No listed species occur in the project area; therefore, no effect to listed species would result from project implementation.
- **Fish and Wildlife.** No effect to fish species would occur with the implementation of the SPPC because the COC will not have water in it during the winter construction timeframe proposed for this project. There may be minor short-term effects such as dislocation of motile animals.

3.1 Water Quality

Affected Environment

Water quality is defined by its capability to support beneficial water uses. These often include water supply for domestic uses, livestock watering, irrigation, aquatic life, recreation, navigation, and aesthetics. A water quality problem occurs when the beneficial or intended use of the waterbody becomes impaired. Chemical, physical, and biological parameters are usually used to measure water quality. Common parameters include bacteria, dissolved oxygen, nutrients, pH, sedimentation, turbidity, temperature, electrical conductivity, and toxics (NRCS 2002).

In Oregon, the Oregon Department of Environmental Quality (ODEQ) manages water quality under the CWA. Oregon has established water quality standards for specific physical and chemical parameters to support beneficial uses of the State's waters. Beneficial uses of the State's waters are assigned by basin in the Oregon Administrative Rules (OAR) for water quality (OAR 340-41-0271). Beneficial uses in the DRB include domestic water supply, industrial water supply, fish and aquatic life, fishing, irrigation, aesthetic quality, boating, livestock watering, wildlife and hunting, water contact recreation, hydropower, and commercial navigation and transportation (Water Quality Standards ODEQ, 2011).

Section 303(d) of the CWA requires States and Tribes to identify waterbodies that do not meet water quality standards and to publish a list of these impaired waters every 2 years. The most recent approved 303(d) list for the State of Oregon is included in ODEQ's *Oregon 2012 Integrated Report* submitted to the U.S. Environmental Protection Agency (EPA) in November 2014 (ODEQ 2012).

The 303(d) list includes categories 1 through 5 that address impaired waters and or waters that are dangerously close to becoming impaired. Several parameters are listed as Category 2 (attaining some criteria) or Category 3 (insufficient data) for the waterbodies of interest. Parameters include the following:

- The Upper Deschutes River listed for temperature, pH, sedimentation, biological criteria, dissolved oxygen, turbidity, chlorophyll a, and aquatic weeds and algae.
- The Little Deschutes River listed for temperature, biological criteria, dissolved oxygen, mercury, and aquatic weeds and algae.
- The Lower Deschutes listed for temperature, pH, biological criteria, dissolved oxygen, sedimentation, chlorophyll a, and aquatic weeds and algae (ODEQ, 2012).

Environmental Consequences

Alternative A – No Action

Under Alternative A, Reclamation would not provide funding for the SPPC Piping Project through its WaterSMART Program. Water quality would remain unchanged and continue to reflect nonattainment under Section 303(d) of the Clean Water Act as previously discussed.

Alternative B – Preferred Alternative

Under Alternative B, Reclamation would provide funding toward the SPPC Piping Project through its WaterSMART Program. Minor temporary impacts on water quality could occur after SPPC Piping Project implementation with the introduction of water in spring 2018. These impacts would be short term, temporary, and considerably less than those impacts associated with "watering-up" the existing open canal. For the long term, the proposed piping project would eliminate sediment recruitment in the 3,000-foot project footprint and eliminate unintentional and intentional input of contaminants in this suburban setting of the project area. Temperature may improve minimally by water shading in the enclosed pipe structure. Generally, water quality would remain unchanged.

Mitigation

Best management practices (BMPs) and process technologies would be implemented in accordance with all Federal, State, county, and local requirements ensuring water quality impacts are avoided or minimized. In the long term, water quality would likely be slightly improved with project implementation.

3.2 Air Quality and Noise

The EPA has designated all areas in the region as meeting attainment, and Bend Oregon has an active air-quality monitoring program. The nearest air-quality monitoring station is located about 2 miles north of the SPPC Piping Project site and provides air quality data reflecting "good" with a few minor variations to "moderate" conditions (see Figure 3). This rating indicates that atmospheric conditions in the area would likely limit dispersion of any potential contaminants.

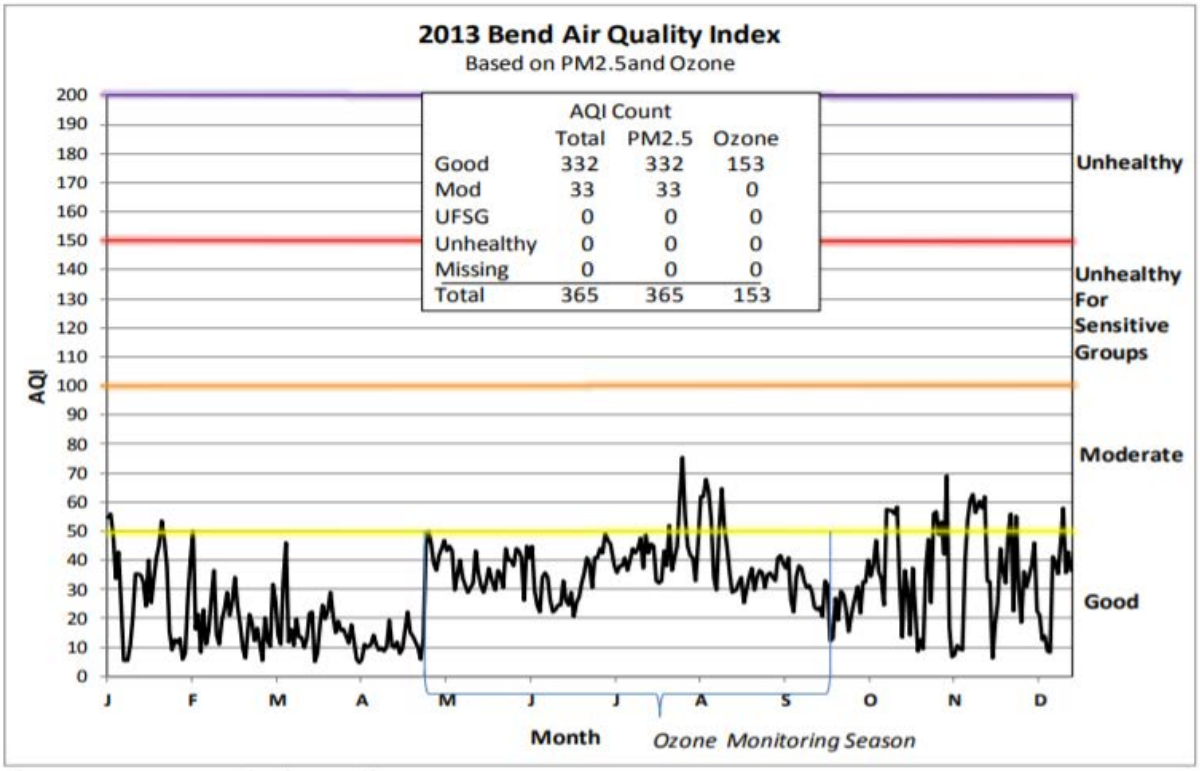

Figure 5. 2013 Bend Oregon Air Quality Index (www.oregon.gov).

The EPA defines noise as unwanted or disturbing sound. Currently, the primary noise sources within the project area include traffic, periodic construction, and aircraft.

Environmental Consequences

Alternative A – No Action

Under Alternative A, Reclamation would not provide funding toward the SPPC Piping Project through its WaterSMART Program. This alternative would have no effect on air quality and noise because there would be no change to existing conditions.

Alternative B – Preferred Alternative

Alternative B would provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program.

Construction activities associated with the Preferred Alternative would result in minor localized and short-term impacts on air quality. Trucks, dozers, loaders, excavators, and other equipment operating at the worksite could cause a minor and temporary increase in dust particulate and gaseous emission levels in the immediate area. If blasting becomes necessary, fugitive dust emissions could increase for brief periods. Construction activities are not expected to have an impact on National or State ambient air-quality standard annual averages for particulate of 15 micrograms per cubic meter (μg/m3) or 35 μg/m3 in a 24-hour period (ODEQ 2014). The SPPC Piping Project does not involve permanent, stationary sources of emissions and would not be regulated by the Clean Air Act.

Noise impacts would be localized, temporary, and limited in context and intensity. Timing of noise-generating sources would be restricted, and upon completion of the project, noise levels would be expected to return to preconstruction conditions.

Mitigation

Mitigation would be required with implementation of the SPPC Piping Project, as temporary noise and air-quality impacts may result from project construction. Mitigation would include the following:

- Work shall be restricted to working hours as controlled by the City of Bend and Deschutes County ordinances. Work would be conducted 7:00 a.m. to 5:00 p.m., Monday through Friday, except when otherwise indicated.
- Only well-muffled equipment would be operated on site to reduce noise impacts on residences and the public.
- Weekend Hours: No work shall be conducted on Saturday and Sunday, except as approved by the engineer and the owner. Approval to conduct work during weekends does not relieve the contractor from conformance to City of Bend and Deschutes County ordinances governing construction activities.
- Holidays: No work shall be conducted on nationally recognized holidays except as approved by the engineer and the owner. Approval to conduct work during holidays does not relieve the contractor from conformance to City of Bend and Deschutes County ordinances governing construction activities.
- Hours for drilling and blasting, if required to construct the work: Monday through Friday 9:00 a.m. to 3:00 p.m.

Fugitive dust-impact minimization would occur through project timing as referenced above. In addition, BMPs and process technologies would be implemented in accordance with all Federal, State, county and local requirements. Construction activities would occur during the winter when soils are moist and frozen, reducing the likelihood for fugitive dust.

3.3 Vegetation and Wetlands

Affected Environment

There are no wetlands in the project area. No further discussion of wetlands will be presented in this EA, but the recognition of this important resource was considered as part of this analysis.

Generally, the SPPC Piping Project is in the Deschutes River valley in a broad sagebrush grassland, which is not as arid as the grasslands farther east. Parts of Bend, all of Redmond and Madras, and parts of Prineville are all in the Blue Mountain region (https://www.deschuteslandtrust.org/explore). Specifically, the project vicinity is experiencing rapid population growth and urban development. The COC in this location shares space with roads, streets, and neighborhoods of single-family residences. As such, the residential suburbs of Bend (Figure 4) reflect invasive and noxious species such as Dalmatian Toadflax, Puncturevine, Orange Hawkweed, Spotted Knapweed, Russian Thistle and others. The City of Bend enforces control of noxious weeds through their Code Enforcement Division (www.bendoregon.gov). COID actively controls invasive and noxious species on managed lands and promotes native species establishment wherever feasible.

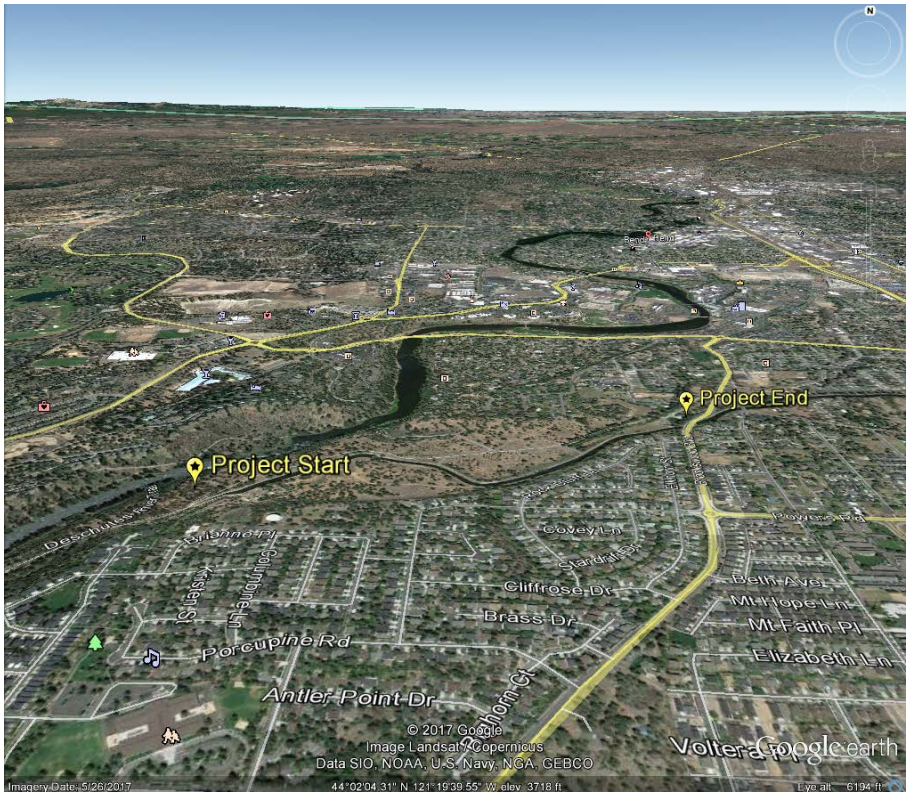

Figure 6. Aerial view of the SPPC Piping Project area.

Environmental Consequences

Alternative A – No Action

Alternative A would not provide funding for the SPPC Piping Project under Reclamation's WaterSMART Program. This alternative would have no effect on vegetation and wetlands because there would be no change to existing conditions.

Alternative B – Preferred Alternative

Alternative would provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program. The Preferred Alternative would have temporary impacts on existing vegetation in a narrow band of land owned by COID along either side of the COC. Some mature trees and other vegetation that have encroached upon the canal banks over the years would be removed during construction.

Mitigation

In addition to BMPs and process technologies implemented during construction to minimize environmental impacts, seedbed preparation and seeding would be specified under contract.

3.4 Cultural Resources

Cultural resources are historic and traditional cultural properties that reflect a group's heritage. Federal law and regulation define historic properties to include prehistoric and historic sites, buildings, structures, districts, and objects that are included, or eligible for inclusion, in the National Register. Traditional cultural properties are locations that have special heritage value to contemporary communities because they are associated with the historical practices or beliefs needed to maintain cultural identity and thus eligible for including on the National Register.

Numerous laws and regulations require agencies to identify cultural resources located on Federal land or resources that would be impacted by a Federal undertaking, and to take action to address the effects of undertakings on properties eligible for the National Register. The National Historic Preservation Act (NHPA) is the principal law defining Federal cultural resource management responsibilities. Section 106 of the NHPA and its implementing regulation (36 CFR 800) define a phased, consultative process to implement responsibilities for Federal undertakings.

The term "historic property" is defined in the NHPA as "any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion on the National Register." The term "historic properties" includes traditional cultural properties. Historic properties are also sometimes referred to as "cultural resources."

Affected Environment

In 1998, the Oregon Department of Transportation (ODOT) prepared and submitted Historic American Engineering Record (HAER) titled, Deschutes Irrigation and Power Company Canal (Central Oregon Irrigation Canal) to the National Park Service in recognition of the importance of the COC and PBC to the settlement and economy of central Oregon. Prior to trail development along the Deschutes River, upstream from the SPPC Pipeline Project, a cultural resource literature review and cultural resource survey was conducted by Bend Parks and Recreation Department (BPRD) in 2005. One historic can-scatter was documented over a mile from the SPPC Pipeline Project area, and recommended as not eligible for the National Register (ODOT 1998).

The entire COID irrigation system was systematically surveyed and evaluated for eligibility for listing on the National Register as a stipulation of the Memorandum of Agreement (MOA) developed for mitigation for piping of COID's I-Lateral (MOA #R14MA13733 among Reclamation, Oregon SHPO, and COID, dated February 2014). COID was required to develop a multiple property document (MPD) detailing the history of irrigation in central Oregon and COID. The MPD required criteria for determining system eligibility and contributing status. The MPD also requires the nomination of two canal sections that display high integrity and include in-period representative components. As the time of the EA, the PBC-Redmond Section has been listed on the National Register.

The survey data compiled as a result of the I-Lateral project was reviewed specifically pertaining to the COC. A historic preservation consultant prepared the Finding of Effect Form after an additional field reconnaissance survey and historic research. The consultant recommended the COC as an eligible contributing feature of the COID system for the National Register, and the project, as proposed, would result in an adverse effect to the historic property. Reclamation initiated consultation with the Oregon SHPO via letter dated September 21, 2017, which included the Finding of Effect Form. Reclamation determined that the COC met the criteria for a historic property, and the project would result in an adverse effect to that historic property (Appendix A). The Oregon SHPO concurred with the findings in a letter dated September 28, 2017 (Appendix A).

The ACHP, in accordance with 36CFR800.6(1), was notified of the adverse effect to historic properties and invited to participate in Section 106 consultation; however, the ACHP did not indicate its willingness to participate within the 15-day timeframe.

Reclamation, COID, and the Oregon SHPO have developed a MOA to stipulate agreed-upon mitigation strategies to resolve the adverse effect. The Deschutes Historical Society, Bend Landmarks Commission, and Restore Oregon were invited to review and comment on the MOA. Restore Oregon declined to review the document; the Deschutes Historical Society and Bend Landmarks Commission both indicated willingness to review the MOA, and they

were provided copies of the draft document. The Deschutes Historical Society responded in support of the mitigation efforts; the Bend Landmarks Commission has not responded.

The BPRD, the Deschutes River Conservancy, the Deschutes Basin Board of Control (DBBC), Coalition for the Deschutes, and Oregon Water Resources Congress (as interested publics) were invited to participate in the MOA as concurring parties. The Deschutes River Conservancy, the DBBC, and the Coalition for the Deschutes have indicated their willingness to sign as concurring parties.

As of this writing, Reclamation has not received MOA concurrence from Oregon SHPO. No earthwork or site disturbance would occur prior to Oregon SHPO's concurrence with the MOA.

Environmental Consequences

Alternative A – No Action

Alternative A would not provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program. This alternative will not result in an adverse effect to the COC, a consensus determined historic property.

Alternative B – Preferred Alternative

Alternative B would provide funding for the SPPC Piping Project under Reclamation's WaterSMART Program. This alternative would result in an adverse effect to the COC, a consensus-determined historic property. Mitigation encompassed in an MOA, as agreed to by the signing parties and supported by the concurring parties, will resolve the adverse effect. Fill dirt would be obtained from an active quarry or an existing COID stockpile. If fill dirt is taken from any other location not previously surveyed for cultural resources, COID would ensure that cultural resources surveys would be conducted in accordance with the NHPA, which includes documentation of archaeological sites and consultation with Oregon SHPO and Reclamation concerning project effect.

Mitigation

In accordance with 36 CFR 800.6, an MOA was signed by Reclamation, COID, and the Oregon SHPO to mitigate for the adverse effect. The Confederated Tribes of the Warm Springs and Burns Paiute Tribes were consulted but chose not to participate as signing parties to the MOA.

Under the MOA, mitigation would consist of the following;

- COID's continued support and development of BPRD's Historic Central Oregon Canal Trail System, a publicly accessible bike and pedestrian trail along portions of COID's canal. BPRD has already developed portions of this trail, and the SPPC Piping project would provide greater access. COID has enacted Resolution No. 2017-15, naming the trail the Central Oregon Canal Historic Trail.

- COID would fund the research, development, and installation of public interpretative signs along the trail. The signs would provide the history and significance of the COC within the development history of Bend and Deschutes County and a brief explanation of the SPPC. The signs would include color and black-white photos, maps, and other graphic material, as appropriate, and would be reviewed by a public interpretation professional. Signs would be fabricated using durable, weather- and vandal-resistant materials to provide long-term public benefit. COID would place the interpretative signs conducive to public display, security, and safety.
- COID would be required to implement an Inadvertent Discovery Plan (included as an appendix to the MOA) if culturally significant properties are discovered or unanticipated effects on historic properties result from SPPC Piping Project.

3.5 Indian Trust Assets

Indian Trust Assets (ITAs) are legal interests in property held in trust by the United States for federally recognized Indian tribes or individual Indians. An Indian trust has three components: (1) the trustee, (2) the beneficiary, and (3) the trust asset. ITAs can include land, minerals, federally reserved hunting and fishing rights, federally reserved water rights, and instream flows associated with trust land. Beneficiaries of the Indian trust relationship are federally recognized Indian Tribes with trust land; the United States Government is the trustee. By definition, ITAs cannot be sold, leased, or otherwise encumbered without approval from the United States Government. The characterization and application of the trust relationship has been defined by case law that interprets Congressional acts, executive orders, and historic treaty provisions.

The Federal government, through treaty, statute, or regulation may take on specific, enforceable fiduciary obligations that give rise to a trust responsibility to federally recognized tribes and individual Indians possessing trust assets. Courts have recognized an enforceable Federal fiduciary duty with respect to Federal supervision of Indian money or natural resources held in trust by the Federal Government where specific treaties, statutes, or regulations create such a fiduciary duty.

Affected Environment

The Burns Paiute Tribe and the Confederated Tribes of Warm Springs have treaty and cultural and historical rights and interests in the area. These may include but are not limited to hunting, fishing, gathering, and other traditional activities. Regardless, the project area is not within a recognized Tribe's reservation boundaries.

Environmental Consequences

Alternative A – No Action

Alternative A would not provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program; therefore, there would be no impacts on ITAs.

Alternative B – Preferred Action

Alternative B would provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program.

Reclamation used its Tessel mapping database to determine the presence of ITAs in the project area. The Tessel database includes all known instances of trust land, reservation land, and village and community sites. The Bureau of Indian Affairs updates the database frequently. No ITAs were identified within a 25-mile radius of the project area; therefore, there would be no effect to their resource.

Mitigation

No mitigation would be required as there are no ITAs within a 25-mile radius of the project area. There would be no effect to ITAs with the implementation of the Preferred Alternative.

3.6 Environmental Justice

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies. Reclamation is required under Executive Order 12898 to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations.

Affected Environment

Data from the U.S. Census Bureau's 2015 American Community Survey shows racial minorities in Bend have noticeably higher rates of poverty. For instance, 12 percent of Bend's white residents lived in poverty in 2015, while the percentages of people living in poverty who are black, Asian or Latino were higher, sometimes nearly double. Census data show the portion of Bend residents in poverty, regardless of race, rose from 5.7 percent to 14 percent between 2005 and 2015. Experts and advocates say the gap between Bend's cost of living and relatively low wages is having an impact on residents of all races but disproportionately affecting the city's minority populations (Bend Bulletin 2016).

Environmental Consequences

Alternative A – No Action

Alternative A would not provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program. Alternative A would not have a disproportionately high and adverse human health or environmental effect on minority and low-income populations. The SPPC Piping Project would not be implmented.

Alternative B – Preferred Alternative

Alternative B would provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program. Alternative B would not have a disproportionately high and adverse human health or environmental effect on minority and low-income populations because the project would not change the existing disproportionately affected low-income and minority populations in central Oregon. There would be no loss of employment opportunity or measurable impact on communities with implementation, because the SPPC Piping Project is specific to a small stretch of the COC.

Mitigation

No mitigation would be required.

3.7 Cumulative Effects

The Council on Environmental Quality (CEQ) identifies a cumulative effect as an "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (CEQ 40 CFR 1508.7).

Reclamation has assessed past, present, and reasonably near future projects in the SPPC Piping Project area for cumulative impacts. Several reasonably foreseeable projects near the proposed action are discussed in this section.

Affected Environment

COID System Improvement Plan. COID developed a system improvement plan (SIP) in 2016. The SIP evaluates COID's primary and secondary canal systems and presents a well-considered plan to address seepage losses and pressurized deliveries. The SIP determined that piping was preferred method to mitigate seepage losses and move toward an efficient pressurized system. COID has approximately 42,666 acres served by two primary canals, the COC and the PBC. These canals were evaluated for seepage loss using state-of-the-art measurement equipment. It was found at the time that approximately 125 cfs in the PBC and 55 cfs in the COC were being lost through seepage. It was also determined that approximately 156 cfs could be conserved in the PBC network and 99 cfs could be saved in the COC network, if the system were completely piped. COID considered pressurization for customer deliveries as a priority and superior to hydropower generation optimization. The approach for system modeling included sustaining pressures at a minimum of approximately 40 pounds per square inch (COID, 2016).

The Bend Urban Area Trail System. Implementation of the SPPC Piping Project would support this popular recreational feature in the City of Bend. BPRD and the City of Bend jointly developed the Bend Urban Area Trail System. This extensive trail system is the result

of decades of strategic planning and extensive public involvement. Since 1995, BPRD, the City of Bend, and citizens have secured and developed many sections of trail identified in the plan. Approximately 65 miles of trail are open for public use.

In 2002, BPRD signed a joint use agreement with COID (June 4, 2002) that allows public access to the canal "ditchrider" roads identified as primary routes in the BPRD trail plan. In January 2003, the district revised its development charge methodology for the park system to allow funding for a new trail. The 2005 BPRD *Park, Recreation, and Green Spaces Comprehensive Plan* inventoried 48 miles of existing trails and park pathways. A district-wide trails master planning effort took place in 2007, which resulted in the adoption of a 2008 *BPRD Trails Master Plan*. The Trails Master Plan identified 97 miles of existing and planned primary and connector trails throughout the district. The Trails Master Plan will be revised as part of a complete rewrite of the BPRD Comprehensive Plan (BPRD 2017).

Deschutes Basin Habitat Conservation Plan. The DBBC and USFWS are currently developing the Deschutes Basin Habitat Conservation Plan (DBHCP) and have begun scoping on an environmental impact statement (82 Federal Register 34326). Covered activities under the DBHCP include water management in the DBBC and the City of Prineville, Oregon. The DBHCP will identify measures to conserve habitat for Oregon spotted frog, Middle Columbia River steelhead salmon, Bull Trout, and other threatened and endangered species in the Upper Deschutes River and Crooked River basins.

Wickiup Dam Hydroelectric Project. On March 25, 2011, Wickiup Hydro Group, LLC (Wickiup Hydro), a subsidiary of Symbiotics LLC, filed an application for an original license to construct and operate its proposed Wickiup Dam Hydroelectric Project (Hydro Project). The proposed project would have an installed capacity of 7.15 megawatts and would be constructed at Reclamation's Wickiup Dam. The proposed project would occupy 1.02 acres of Federal lands within the Deschutes National Forest administered jointly by Reclamation and the U.S. Forest Service. The proposed project boundary would be located about 330 feet upstream from the Upper Deschutes Wild and Scenic River boundary, which begins 740 feet downstream from Wickiup Dam and continues for 54 miles (FERC, 2012). The proposed Hydro Project would operate in a run-of-release mode using flows released from Wickiup Dam for irrigation deliveries and other downstream purposes; therefore, it would not alter the timing or quantity of water released at the dam (USFWS 2017).

On August 28, 2017, the USFWS issued a biological opinion (BiOp) concluding the Wickiup Project, as proposed, is not likely to jeopardize the continued existence of the Oregon spotted frog and is not likely to destroy or adversely modify critical habitat. A main issue for the agency's review involves the potential for an increased number of non-native fish species to get through the dam, posing a possible threat of greater predation farther downstream. Changes to flows and storage and release operations could prompt a need for the USFWS to conduct additional review of the Hydro Project proposal.

The USFWS has set various conditions for the project, including studies and a monitoring plan meant to evaluate impacts on fish populations and interactions of different fish species.

These conditions have prompted the ODEQ to request an updated application for a water quality certification. Wickiup Hydro submitted a 401 Water Quality Certification Application to ODEQ on February 8, 2017. ODEQ has one year to issue a decision either approving or denying the required certification (Bend Bulletin 2016).

Environmental Consequences

Alternative A – No Action

Alternative A would not provide funding for the SPPC Piping Project under Reclamation's WaterSMART Program.

COID System Improvement Plan. Without the SPPC Piping Project, water would continue to be lost through seepage and evaporation. Progress in the overall SIP water conservation goals would not be supported. The SIP is considered a component of the DBHCP adaptive management goals for DRB instream flow augmentation.

Bend Urban Trails System. Without implementation of the SPPC Piping Project, it is unlikely that the Central Oregon Canal Historic Trail would be developed on the project site. The effect would preclude planned improvements along the 3,000-foot project site negatively affecting trail development.

Deschutes Basin Habitat Conservation Plan. While the effects of the DBHCP are not entirely known, the adaptive management and monitoring activities under the DBHCP would be adversely affected, as the 5 cfs of conserved water would not be available for other beneficial uses including the DBHCP.

Wickiup Dam Hydroelectric Project. Due to the uncertainty of the flow regime downstream from Wickiup Dam, further studies by Wickiup Hydro and review by USFWS, USFS, and other agencies are likely to continue. The outcome of this hydropower project remains in the planning stages making the cumulative effect indeterminable.

Alternative B - Preferred Alternative

Alternative B would provide funding toward the SPPC Piping Project under Reclamation's WaterSMART Program.

COID System Improvement Plan. Implementation of the SPPC Piping Project would advance progress in the overall SIP water conservation goals. The SIP is supportive of the DBHCP adaptive management and monitoring goals for DRB instream flow augmentation.

Bend Urban Trails System. Implementation of the SPPC Piping Project would support continued development and improvement of the system. In the long term, BPRD and COID would develop a trail, including the SPPC project footprint, to improve public safety and access, neighborhood tranquility, and trail continuity. BPRD and COID continue to work together under a long-standing MOA signed on June 4, 2002 that provides for a trail system open to public, and by specific easements granted to BPRD for those portions of COID lands that conform to the requirements set forth in the 2002 MOA. In addition, on December 13,

2017, COID adopted Resolution Number 2017-15 Naming the trail Central Oregon Canal Historic Trail (Horton, 2017).

Deschutes Basin Habitat Conservation Plan. This plan would reflect better understanding of Oregon spotted frog and other species studied under the plan to determine the habitat requirements and optimize species survival. Continued adaptive management of the DRB through the DBHCP is likely to change in the long term focusing on balance of effects to the environment and irrigation works.

The Preferred Alternative would support the DBHCP by permanently protecting 5 cfs of instream flow. The precise conservation measures of the DBHCP remain in development; therefore, the effects of the DBHCP are not entirely known.

Reclamation anticipates the DBCHP will improve long-term water availability for instream flows in the Upper Deschutes River and Crooked River basins through cooperative water conservation and allocation efforts of the DBBC and the City of Prineville. Reclamation anticipates that completion of the DBHCP would result in reduced demand for stored water, increased instream flows in the Upper Deschutes River, and an increase in water conservation projects within DBBC lands.

Wickiup Dam Hydroelectric Project. Effects would likely be the same as Alternative A.

Mitigation

No mitigation for cumulative effects is recommended.

Chapter 4. Consultation and Coordination

4.1 Consultation

Section 106 Consultation – NHPA

The effects of activities related to this action are addressed in Section 3.4 – Cultural Resources.

4.2 Coordination

Reclamation used an interdisciplinary approach to prepare this EA to comply with the mandate of the NEPA to, "…utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the environmental design areas in planning and in decision-making which may have an impact on man's environment" (40 CFR 1501.2(a)). Reclamation worked with COID and BPRD during the development of this EA.

Chapter 5. Literature Cited

Reference	Description
BPRD 2017	Bend Park and Recreation District. 2017. Bend Urban Trails Plan, *Take a Hike!*. www.bendparksandrec.org
Bend Bulletin 2016	December 25 & 30, 2016, Census Finds Minorities More Likely to Live in Bend/Plans-for-Hydroelectric-Project-Keep-Churning. www.bendbulletin.com/localstate/.../ www.bendbulletin.com/.../bend/4921871.../
BPRD	Bend Park and Recreation District. 2017. Bend Urban Trails Plan, *Take a Hike!*. www.bendparksandrec.org
COID 2016	Central Oregon Irrigation District. 2016. *System Improvement Plan*, prepared by Black Rock Consulting. July 2016
FERC 2012	Federal Energy Regulatory Commission. 2012. *Draft Environmental Assessment for Hydropower License. Wickiup Dam Hydroelectric Project – FERC Project No. 12965-002. Oregon.* U.S. Department of Energy, FERC Office of Energy Projects, Division of Hydropower Licensing, Washington, D.C.
Horton 2017	Horton, Don. 2017 Executive Director, Benton Parks, and Recreation Department. Personal communication, November 17, 2017.
ODEQ 2012	Oregon State Department of Environmental Quality. 2012. *Oregon 2012 Integrated Report.* Accessed October 2016: http://www.deq.state.or.us/wq/assessment/rpt2012/results.asp
ODEQ 2017	Oregon State Department of Environmental Quality. 2017. Air Quality Programs. Accessed December 2017.
ODOT 1998	Oregon Department of Transportation. Historic American Engineering Record. Deschutes Irrigation and Power Company Canal (Central Oregon Irrigation Canal). HAER #ORE 9-Bend, 1-3. Columbia Cascades Support Office, National Park Service, Seattle, WA.
USFWS 2017	U.S. Fish & Wildlife Service. 2017. Biological Opinion USFWS 01EOFW00-2017-F-0579 *Wickiup Hydroelectric Project*, August 2017

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Appendix A

Reclamation's Determination of Eligibility and Effect

Oregon SHPO's Concurrence with Determination

United States Department of the Interior

BUREAU OF RECLAMATION
Pacific Northwest Region
Columbia-Cascades Area Office
1917 Marsh Road
Yakima, WA 98901-2058

IN REPLY REFER TO:

BFO-1413
2.1.1.04

Sept. 21,2017

Ms. Chrissy Curran, Deputy SHPO
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, Oregon 97301-1266

Subject: U.S. Bureau of Reclamation's 2017 WaterSmart Grants - Deschutes County
Central Oregon Irrigation District's Siphon Power Property Canal Project
SHPO Case #17-1509: Determination of Eligibility and Effect

Dear Ms. Curran:

Central Oregon Irrigation District (COID) has recently been awarded funding through the WaterSmart Grants Program for piping of a segment of the Central Oregon Main Canal. This proposed undertaking involves piping of approximately 3,000 ft. with the goal of conserving energy and water and allowing for increased flows in the Deschutes River. As such, this action is considered a federal undertaking and therefore subject to review under Section 106 of the National Historic Preservation Act.

The Section 106 Documentation Form for the Built Environment was completed by Kramer & Company, under contract to COID. That document was submitted to your office on Aug. 30, 2017. The Bureau of Reclamation agrees with the recommendation that the Central Oregon Main Canal is *eligible* to the National Register of Historic Places. As such, this proposed undertaking will result in an *Adverse Effect*, and respectively requests your concurrence in this determination.

Thank you in advance for your assistance, and please direct any ensuing correspondence, or requests for additional information to Ms. Chris Horting-Jones, Archaeologist at the Bend Field Office, 1375 SE Wilson Ave, #100, Bend, OR 97702 at chortingjones@usbr.gov, or at 541-389-6541, extension 236.

Sincerely,

FOR

Dawn A. Wiedmeier
Columbia-Cascades Area Manager

Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org

September 28, 2017

Ms. Chris Horting-Jones
Bureau of Reclamation/Bend Field Office
1375 SE Wilson Ave. #100
Bend, OR 97701

RE: SHPO Case No. 17-1509
Central Oregon Irrigation District (COID), Siphon Plant Piping Project
Pipe 3000 foot section
Central Oregon Canal Portion (61535 Brookswood Blvd), Baker City, Deschutes County

Dear Ms. Horting-Jones:

Thank you for your submittal regarding the Central Oregon Irrigation District (COID), Siphon Plant Piping Project as referenced above. We concur that the evaluated segment of the Central Oregon Canal is individually eligible for listing in the National Register of Historic Places. We also concur that the project represents an adverse effect and look forward to developing an appropriate approach towards mitigation. While there is significant flexibility in mitigation, our office relies on the following guiding principles that include but are not limited to:

1. Mitigation that consists of some form of additional documentation such as Oregon State Level Documentation, HABS/HAER Documentation, or additional survey and evaluation of associated historic properties. The additional documentation that is ultimately chosen as mitigation is dependent on the property, the scope of the undertaking, and other project specifics.
2. Mitigation that is relevant to the affected property, located on-site if possible or effective, and commensurate with the scale of the adverse effect.
3. Mitigation that provides some tangible measure of education and information for the public that is as accessible as possible.

Please feel free to visit our website to view some examples of successful past mitigation projects: http://www.oregon.gov/oprd/HCD/SHPO/Pages/preservation_106_examplemitigation.aspx.

Our response here is to assist you with your responsibilities under Section 106 of the National Historic Preservation Act. Local regulations, if any, still apply and review under local ordinances may be required. Please contact our office at your earliest convenience to begin a dialogue regarding mitigation and next steps for the project.

Sincerely,

Jessica Gabriel
Historian
(503) 986-0677
Jessica.Gabriel@oregon.gov