

## **United States Department of the Interior**



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OCT 02 2017

Ms. Cinthya Román, Chief, Environmental Review Branch U.S. Nuclear Regulatory Commission 11555 Rockville Pike Mail Stop T-4B16 Rockville, MD 20852

Subject: List of endangered and threatened species and critical habitat potentially impacted for the proposed 40-year license renewal for the Trojan Independent Spent Fuel Storage Installation license renewal request (Docket Number: 72-0017; USFWS Number: 01EOFW00-2017-TA-0614)

## Dear Ms. Román:

On September 11, 2017, the Fish and Wildlife Service (Service) received, by letter dated August 15, 2017, your request for technical assistance in developing a list of threatened and endangered species and critical habitat that may be impacted as a result of the proposed 40-year license renewal for the Trojan Independent Spent Fuel Storage Installation license renewal request. The permit in question (Materials License Number SNM-2509) is held by Portland General Electric (PGE) and allows PGE to store spent nuclear fuel at the Trojan Independent Spent Fuel Storage Installation (ISFSI).

To fulfill your request, Service staff accessed the Information for Planning and Consultation (IPaC) system at <a href="https://ecos.fws.gov/ipac">https://ecos.fws.gov/ipac</a>. We delineated the boundary of the ISFSI using satellite imagery and submitted the mapped area to IPaC to generate a list of threatened and endangered species and critical habitat. The IPaC system is available to the public and can be used by any applicant or agency to generate a list of potentially affected resources regulated by Service within a project area.

IPaC lists the following species as potentially impacted by actions in the mapped area: Bradshaw's desert-parsley (*Lomatium bradshawii*), Kincaid's lupine (*Lupinus sulphureus* ssp. *kincaidii*), Nelson's checkermallow (*Sidalcea nelsoniana*), Willamette daisy (*Erigeron decumbens*), Columbia white-tailed deer (*Odocoileus virginianus leucurus*), red tree vole (*Arborimus longicaudus*), marbled murrelet (*Brachyramphus marmoratus*), northern spotted owl (*Strix occidentalis caurina*), streaked horned lark (*Eremophila alpestris strigata*), yellow-billed cuckoo (*Coccyzus americanus*), and bull trout (*Salvelinus confluentus*). There are no designated critical habitats in this area.

Satellite imagery of the ISFSI shows a developed site, apparently lacking the natural habitat characteristics necessary to attract or support the endangered and threatened species listed above. Accordingly, these species are unlikely to be present within the boundaries of the ISFSI. In your letter, you remarked that PGE has no intent to expand the ISFSI capacity, and that "no radioactive gaseous or liquid effluents are released from, nor is sanitary waste generated at, the ISFSI during routine operation." If at any point the boundaries of the ISFSI are expanded or any effluents are released into the environment, targeted surveys of the affected area may be necessary to determine potential impacts to endangered and threatened species. In this case, further technical assistance may be required. If any effects are anticipated in the Columbia River adjacent to the ISFSI, there is the potential for impacts to species under the jurisdiction of the National Marine Fisheries Service and coordination with that agency may be required.

Thank you for your coordination on this project. If you have any questions regarding the information in this letter, please contact Thomas Brumbelow of my staff by telephone at 503-231-6179 or by email at <a href="mailto:thomas\_brumbelow@fws.gov">thomas\_brumbelow@fws.gov</a>.

Sincerely.

Paul Henson, Ph. D. State Supervisor

## UNITED STATES DEPARTMENT OF THE INTERIOR FISH AND WILDLIFE SERVICE

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