

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Transmission Line Marker Ball Urgent Replacement Project - Fiscal Year 2020

PP&A No.: 4217

Project Manager: Mark Korsness-TEP-TPP-1

Location: Nez Perce County, ID, Mineral County, MT, Clackamas, Sherman, Umatilla, and Wasco counties, OR, Garfield, Klickitat, Whitman, and Yakima counties WA

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance; B3.2 Aviation activities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to remove and replace marker balls on nine transmission lines in Oregon, Washington, Idaho, and Montana. As part of BPA's wildfire risk minimization effort, BPA noted that plastic and fiberglass marker balls could fail at their attachment point on the conductor or ground wire, potentially igniting and falling to the ground to start wildfires. BPA crews have identified those marker balls most at risk for failure where emergency replacements are needed. BPA would like to reduce wildfire risk by completing replacements of marker balls with the greatest potential for failure before the 2020 wildfire season. Replacement work is currently scheduled for April through June 2020, with work on each individual transmission line lasting between 2 to 5 days.

BPA proposes to replace marker balls on the John Day-Marion No. 1, Ashe-Marion No. 2/Buckley-Marion No. 1, Wautoma-Knight No. 1/North Bonneville-Midway No. 1, Wautoma-Rock Creek No.1, Lower Granite-Hatwai No. 1, McNary-John Day No. 2, and Dworshak-Taft No. 1 lines utilizing Human External Cargo (HEC), or a crew suspended from a helicopter. For replacements on these lines, helicopter landing zones would be necessary for helicopters to land and take off, as well as for staging crew and equipment. In some cases, new routes of travel would be necessary to access helicopter landing zones. No improvements to, grading of, or other ground disturbing work for helicopter landing zones or access roads is anticipated. Large flatbed trucks or similar vehicles would be used to haul materials and equipment but use of loaders, excavators, or other heavy equipment is not anticipated.

Marker balls on the McNary-Roundup No. 1 and Ellensburg-Moxee No. 1 lines would be replaced with ground-based crews and bucket trucks. Ground-based work would require landings for bucket trucks, which would also serve as staging areas for materials and equipment. As with helicopter work, new routes of travel would be necessary in some cases to access landings. No improvements to, grading of, or other ground disturbing work for landings or access roads is anticipated. Use of loaders, excavators, or other heavy equipment also is not anticipated.

BPA may utilize either helicopters or drones to examine marker balls prior to replacement and to inspect marker balls following replacement for proper installation.

Findings: In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Laura Roberts
Laura Roberts
Biological Scientist

Concur:

/s/ Katey Grange
Katey Grange
NEPA Compliance Office

Date: February 6, 2020

Attachment(s): Environmental Checklist

Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

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Project Site Description

The project is located in Oregon, Washington, Idaho, and Montana. The project area traverses several land cover types, such as forested, agricultural, rangeland, urban, and would span several river and stream crossings. Work would occur on privately-owned lands in addition to lands managed by the US Forest Service (Mt. Hood National Forest and Lolo National Forest), US Bureau of Land Management, Confederated Tribes of the Warm Springs, Confederated Tribes and Bands of the Yakama Nation, State of Montana-Department of Transportation, US Army Corp of Engineers, Department of Defense-Yakima Training Center, US Army-Fort Lewis, and State of Washington-Department of Natural Resources. See Table below, for Township, Range, Section Number, County, and information.

Township	Range	Section	State
3N	17E	11,12,14-16,20,21,29	WA
4N	18E	23,26	WA
10N	21E	26,27	WA
11N	45E	4,5,9-12	WA
11N	46E	7-9	WA
12N	44E	1	WA
12N	45E	6,7,17,18,20,29,32	WA
13N	43E	2,3,11-13,18-20,27-29,34,35	WA
14N	19E	28,33,34	WA
3N	17E	28,33	OR
4N	29E	7,18	OR
6S	6E	27,34	OR
6S	10E	3,4,39,40	OR
19N	31W	7	MT
20N	31W	48	MT
36N	6W	24,25	ID

Evaluation of Potential Impacts to Environmental Resources

**Environmental Resource
Impacts**

**No Potential for
Significance**

**No Potential for Significance,
with Conditions**

1. Historic and Cultural Resources



Explanation: Following a review of the potential project impacts to cultural resources, BPA has determined that this undertaking would result in No Historic Properties Affected.

The BPA Historian review has shown that marker ball replacement is considered normal, in-kind repair work and would not adversely affect the National Register eligibility of any transmission lines.

Between November 15, 2019 and December 10, 2019 the BPA archaeologist contacted the consulting parties by phone and email. Initiation letters were sent December 2, 2019 through December 10, 2019. Concurrence on the proposed areas of potential effect and project approach was received from the

Oregon SHPO between December 19, 2019 through January 7, 2020, from the Washington DAHP between December 5, 2019 and December 11, 2019, from the Montana SHPO on November 11, 2019, and from the Idaho SHPO on December 16, 2019.

The impact of the proposed landing zones, landings, and access roads was assessed through pedestrian survey by BPA archaeologists, BPA contract archaeologists, and a Lolo National Forest archaeologist between November 21, 2019 and December 17, 2019. No historic properties were identified as a result of pedestrian survey. The BPA archaeologist emailed consulting parties with the results of inventory between November 22, 2019 and February 5, 2020.

No monitoring or minimization measures are necessary for the implementation of the project. If any additional work sites (landings, landing zones, access routes, etc.) are necessary for the project, Section 106 consultation and concurrence from the appropriate parties must be obtained prior to use.

2. **Geology and Soils**



Explanation: Minimal to no ground disturbance is anticipated.

Note: The following minimization measures would be implemented to minimize impacts to geology and soils.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal

3. **Plants** (including Federal/state special-status species and habitats)



Explanation: Minimal disturbance to vegetation is anticipated. Vegetation may be crushed in those locations where equipment would be accessing marker balls. There would be no effect to ESA-listed plant species. No impacts to state, US Bureau of Land Management, or US Forest Service sensitive species are anticipated.

In addition, on National Forest System lands managed by Mt Hood National Forest and Lolo National Forest, BPA would comply with the *Standard Operating Procedures for limiting the spread of invasive species and fire prevention as directed in the Federal Land Policy and Management Act (FLPMA)*.

Note: The following minimization measures would be implemented to minimize vegetation impacts.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal

4. **Wildlife** (including Federal/state special-status species and habitats)



Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated helicopter and equipment noise and human presence. The project would have no impacts to state, US Bureau of Land Management, or US Forest Service sensitive species.

The project would have a no effect to ESA-listed species with the exception of Northern spotted owl. One area of the project located on the Mt Hood National Forest occurs within Northern spotted owl Designated Critical Habitat and has the potential for nesting owls. Because the project would be occurring during the spotted owl critical breeding period of March 1st through July 15th, it has the potential to impact the species. BPA worked with the US Forest Service to determine that BPA's Transmission Line Marker Ball Urgent Replacement Project – Fiscal Year 2020 (John Day-Marion No. 1 span 91/3 – 91/4) activities fall within the determination of “may affect, not likely to adversely affect” for Power line maintenance and Aerial operations activities as described in the *2017 Biological Opinion for Routine Land Management Activities within the Willamette Planning Province of Oregon with the Potential to Disturb the Northern Spotted Owl*.

Note: The following minimization measures would be implemented to minimize impacts to wildlife and

their habitat.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal

In accordance with the Biological Opinion, fly helicopters a minimum of 330 feet above designated Critical Habitat except for when they are working directly in the right-of-way or landing in designated landing zones, where there would be no minimum distance requirement

5. **Water Bodies, Floodplains, and Fish**
(including Federal/state special-status species, ESUs, and habitats)



Explanation: There would be no ground disturbing activities in any river, stream, or other waterbody along the project and no riparian vegetation would be impacted. The project would have no effect to ESA-listed fish species.

Note: The following minimization measures would be implemented to prevent sediment or contaminants from reaching any waterbodies.

- Erosion control measures would be implemented to prevent sedimentation or dust.
- Appropriately stocked spill response kits would be located on vehicles and landing zones used on this project.

6. **Wetlands**



Explanation: There would be no ground disturbing activities in wetlands along the project.

Note: The following minimization measures would be implemented to prevent sediment or contaminants from reaching any wetlands.

- Erosion control measures would be implemented to prevent sedimentation or dust.
- Appropriately stocked spill response kits would be located on vehicles and landing zones used on this project.

7. **Groundwater and Aquifers**



Explanation: No impacts to ground water or aquifers are anticipated due to the lack of ground disturbance.

Note: The following minimization measures would be implemented to minimize groundwater contamination potential.

- Appropriately stocked spill response kits would be located on vehicles, other equipment, fly yards used on this project.

8. **Land Use and Specially Designated Areas**



Explanation: No change in land use would occur and project activities would not impact existing land uses.

Note: The following minimization measures would be implemented to minimize impacts to land use and specially designated areas.

For those portions of the project crossing the Mt. Hood National Forest and the Lolo National Forest, the *Memorandum of Understanding between the Bonneville Power Administration United States Department of Energy and the United States Forest Service United States Department of Agriculture Regarding Transmission Facilities and Access to Those Facilities on National Forest System Lands Standard Operation Procedures* listed below would be implemented:

- **Section VIII** Emergency maintenance
- **Section X** Fire control communication and coordination
- **Appendix E** Fire Prevention and Suppression

9. **Visual Quality**



Explanation: The project would have a minimal impact to visual quality. Replacement marker balls would be similar to the existing marker balls, and consistent with other marker balls along the transmission line.

10. **Air Quality**



Explanation: A small amount of vehicle emissions and dust may occur temporarily during construction.

11. **Noise**



Explanation: Some temporary construction noise from construction activities and helicopter use would occur during daylight hours. The operational noise of the transmission line would not change.

12. **Human Health and Safety**



Explanation: No impacts to human, health, and safety are anticipated.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.

Explanation, if necessary:

- Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary:

Landowner Notification, Involvement, or Coordination

Description: BPA realty and environment have coordinated the proposed project activities with Mt Hood National Forest, Bureau of Land Management, Confederated Tribes of the Warm Springs, Confederated Tribes and Bands of the Yakama Nation, Lolo National Forest, State of Montana-Department of Transportation, US Army Corp of Engineers, Department of Defense-Yakima Training Center, US Army-Fort Lewis, State of Washington-Department of Natural Resources, and private landowners.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Laura Roberts
Laura Roberts, EPI-4
Biological Scientist

Date: February 6, 2020