

Big Eddy-Ostrander Conductor Replacement

Finding of No Significant Impact
Bonneville Power Administration
DOE/EA-2287
July 2025

INTRODUCTION

Bonneville Power Administration (BPA) announces its environmental findings for its proposal to replace the conductor, insulators and associated hardware on about 66.5 miles of its Big Eddy-Ostrander, No. 1 transmission line. BPA would also improve the access road network for the transmission line, including repairing, replacing or installing drainage features. BPA is also proposing to remove trees that pose a threat of falling or growing into the conductor and causing unplanned electrical outages.

BPA developed an environmental assessment (EA) evaluating the Proposed Action and the No Action Alternative. The EA was released for a 30-day public comment period from March 27 to April 26, 2025. BPA received comments from 12 interested parties. Responses to those public comments are presented in Appendix H of the Final EA. As a result of public comments, refinements or changes to the mitigation measures or changes to the environmental analysis are presented in the Final EA.

BPA hereby adopts the EA, and based on its analysis and public comments received, BPA has determined that the Proposed Action 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.*).¹ 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.

Attached is a Mitigation Action Plan that lists all the mitigation measures that BPA and its contractors are committed to implementing.

PUBLIC AVAILABILITY

A notification of FONSI availability will be distributed to interested parties and other potentially affected parties. The FONSI will be posted on BPA's project website and mailed directly to interested parties who requested a copy.

<http://www.bpa.gov/nepa/Big-Eddy-Ostrander>

PROPOSED ACTION

Under the Proposed Action, BPA would replace the conductors and hardware on the Big Eddy-Ostrander transmission line, increase the heights of 65 transmission structures, and upgrade the access road system that allows BPA access to the line. The project area includes the existing transmission line and right-of-way, access roads, substations, and other temporary construction areas.

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this EA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

The Proposed Action would include the following:

- Replace conductors
- Increase the heights of certain structures
- Ground excavation in certain spans to increase ground-to-conductor clearance for safety and reliability
- Steel member replacements
- Install fall protection on the transmission structures
- Upgrade the access road system
- Remove danger trees and other vegetation

Additional details about the Proposed Action are presented in Chapter 2 of the Final EA.

NO ACTION ALTERNATIVE

Under the No Action Alternative, BPA would not replace the conductor on the transmission line, correct transmission line impairments, or upgrade access roads as a single coordinated project. BPA would continue to operate and maintain the existing transmission line in its current condition, replacing failed conductor fittings, correcting impairments, and maintaining access roads to allow access to structures on an as-needed basis, and managing vegetation for safe operation.

Given the current poor condition of the conductor on the transmission line, the No Action Alternative would likely cause more frequent and more disruptive maintenance activities than has been required in the past. It might be possible to plan some repairs, but many would likely occur on an emergency basis as the transmission line continues to deteriorate and could lead to extended unplanned outages.

SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION

To determine whether the Proposed Action has the potential to cause significant environmental effects, BPA analyzed the potential impacts of the proposal on human and natural resources and presented them in Chapter 3 of the EA. The potential impacts associated with the Proposed Action are summarized below. The Proposed Action, with implementation of mitigation measures, 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, Recreation and Transportation

Impacts to land use, recreation and transportation would be low.

- Land use would not change as a result of project activities.
- Disruptions to existing forestry activities would be temporary and short term because construction would be completed in phases over several years. Individual private forest landowners would likely be affected for only a few months when nearby construction segments are underway.
- There would be no conversion of agricultural lands to another land use. Orchard owners and agricultural land owners would be fairly compensated for loss of orchard trees or crop damage from project activities.
- Residential landowners near the project area may be temporarily impacted by noise, dust, and access disruptions due to construction activities; however, construction would adhere to applicable state, county and city requirements for traffic control and lane closures. Work would occur during daylight hours, as practicable.

- Increased traffic and traffic delays may occur during construction; however, delays would be temporary and local residents and businesses would be notified of upcoming construction activities and potential delays.
- Temporary closures of portions of recreational sites that cross the project area may occur, along with traffic delays and noise impacts due to construction activities. Flaggers would be present to pause construction work to minimize delays to recreational users in the area. Construction may require recreational users to use alternate recreational areas for a short duration.

Visual Quality

Impacts to visual quality would be low.

- No new hard forest edges would be created. Select tree removals would create more of an undulating forest edge in some locations. Tree removal near the Pacific Crest Trail would follow guidelines from the Pacific Crest Trail Association and the USFS, to minimize visual impacts.
- Most of the access road improvements and structures are not in areas that would be visible to sensitive viewers, and construction would occur over a short duration.
- Changes to structure heights would not be visible from key viewing areas of the Columbia River Gorge National Scenic Area or other scenic areas. Structures that are proposed to be raised would be of similar heights as other structures within the right-of-way.

Soils and Geologic Hazards

Impacts to soils and geologic hazards would be low to moderate.

- Approximately 155 acres of soil would be disturbed in structure work areas. Approximately 50 miles of existing access roads would be improved or reconstructed. New access roads would permanently disturb about 0.6 acre of soil and new landings would permanently impact approximately 0.7 acre of soil.
- Exposed soils disturbed during construction would be required to be mulched, re-seeded and monitored to reduce the potential for erosion, to mitigate short- and long-term impacts due to construction. Additionally, work would occur during the dry season, to the extent possible and mats would be used in saturated soils to reduce soil compaction.
- About 30 miles of the project are in areas that pose a high risk of landslides. Access road improvements and drainage upgrades would improve drainage on slopes and reduce water impoundment during high precipitation events that could lead to saturated soils that set off landslides. If geotechnical issues arise during construction, site stabilization and mitigation measures would be implemented.
- Stumps from danger tree removals would be left in place, and the adjacent vegetation would be left in place to decrease the potential for soil erosion.

Vegetation

Impacts to vegetation would be none to moderate.

- About 120 acres of vegetation would be temporarily disturbed at structure sites and pulling and tensioning locations. Temporarily disturbed areas would be required to be revegetated post-construction.
- Access road work and landing installations would permanently remove about 80 acres of vegetation.
- About 2,300 danger trees would be removed along the edge of the right-of-way and could open small, forested areas to light, which would make these locations vulnerable to weed invasions, but tree removals would be conducted in a manner that minimizes disturbance areas and

impacts to the surrounding native plant communities. Additionally, the existing vegetation would be allowed to regrow, which would minimize the potential for weeds.

- Construction activities would increase the potential for the spread of invasive plants; however, construction equipment and vehicles would be required to be clean when entering the project area, and strategic wash stations would be set up to prevent the spread of weeds.
- Two rare plant species would be impacted by the project: Sicklepod rockcress (*Bochera atrorubens*) and Watson's desert parsley (*Lomatium watsonii*). Approximately, ten individual rockcress plants would be permanently lost by access road reconstruction activities and up to another 30 rockcress plants would be potentially impacted by pulling and tensioning work. The work, however, would occur after the plants have senesced, which would allow the plants to set seed and then die back prior to construction work. Soil compaction may impact the root systems of individual plants and cause mortality, but the level of potential mortality would not contribute to a trend towards federal listing.
- The Watson's desert parsley population occurs on USFS-managed land and is a federal sensitive species. This is the only population (about 400 individual plants) that is known to occur on the Mt. Hood National Forest. BPA would restrict the work area near this population, but up to ten individual plants would be impacted by construction activities. This would represent approximately a 2.4 percent loss to the total population and would not contribute to a trend towards federal listing or cause a loss of viability to the population or species.

Water Resources, Floodplains and Fish

Impacts to streams and fish would be none to low.

- Access road improvements would decrease the amount of sedimentation into waterways and fish habitat, where stormwater may currently flow down or over an access road.
- Access road improvements would temporarily impact approximately 40 intermittent streams and 13 perennial streams by increasing turbidity and sedimentation during in-water work. The work would occur during the dry season and during the approved in-water work window. However, the replacement of undersized culverts and installation of drainage features would overall improve water quality in the long-term.
- Only a small number of trees within floodplains would be removed. Approximately, 60 feet of access road improvements would occur within a flood zone. No new structures would be constructed in floodplains. Floodway storage capabilities would likely remain unchanged.
- Ten fish bearing streams would be impacted to replace undersized culverts with fish-passage culverts, new bridges, or installation/repair of fords in previously disturbed areas. Replacement and improvements to drainage features would occur during the appropriate in-water work window. ODFW and NOAA (for ESA species) have reviewed and approved the fish-passage designs.

Wetlands

Impacts to wetlands would be low to moderate.

- Approximately 40 different wetlands would be impacted to varying degrees, resulting in approximately 1.5 total acres of permanent wetland loss. The project qualifies for a Nationwide Permit from US Army Corps of Engineers, but an individual permit would be required from Oregon Department of State Lands (DSL). BPA proposes to mitigate for impacts by making a payment to DSL's in-lieu fee payment system because there are no wetland banks that serve the portions of the project where impacts are occurring.

- Access road improvements in wetlands, including drainage features, would occur within the existing access road prism, to the extent possible, to minimize impacts.
- Approximately 75 danger trees would be removed within 12 wetlands across the project area. Stumps would be left intact to avoid wetland disturbance.
- Wetland mats would be used at wetlands in structure work areas, pulling and tensioning sites and direction of travel roads to minimize soil compaction and disturbance to vegetative root systems. Vegetation would be expected to regrow after construction has been completed, and wetland functions are expected to return to pre-construction conditions.

Wildlife

Impacts to wildlife would be low.

- Danger tree removal could affect common wildlife species and Northern spotted owl critical habitat; however, BPA has proposed to create 82 habitat trees in Northern spotted owl critical habitat and USFS-designated late successional reserves. This would be accomplished by topping the trees and girdling them to create standing snags for wildlife.
- Suitable habitat for Northern spotted owl is available across much of the project area where it crosses USFS and BLM-managed lands. Northern spotted owls were assumed to occupy that habitat and timing restrictions would be implemented during construction to reduce impacts.
- While unlikely, it is possible that gray wolves and wolverines could use the project area as dispersal habitat. No permanent habitat loss for these species would result from project activities. Given the reclusiveness of both species, they would likely avoid construction areas.
- Pre-construction surveys would occur for streaked horned lark on the far western end of the project, if construction activities are planned during the nesting season.
- Effects to candidate ESA species (monarchs, Northwestern pond turtle and Suckley's bumble bee) are expected to be no-to-low. Flowering plants in the undisturbed areas of the right-of-way would provide ample nectar resources for monarchs and Suckley's bumble bee. The monarch's host plant, milkweed, was only found to occur in one location where work is proposed. If Northwestern pond turtle becomes listed, a wildlife biologist would need to conduct pre-construction nest surveys in areas where the species could occur.
- The project may impact state protected and federal sensitive wildlife species. Wildlife, such as mammals and birds, may temporarily avoid construction areas. Less mobile species, such as amphibians and reptiles, may experience individual mortality, but it would not contribute to overall regional population declines.
- There is reasonable assurance that USFS Survey and Manage species populations would continue to persist and would not be affected by project activities because the majority of access road improvements are within the existing road prism and danger tree removal would not remove large swaths of habitat. If any Survey and Manage species are documented during construction activities, BPA would work with the federal land manager to document the species and implement BMPs to avoid or minimize impacts to those species.

Cultural Resources

Impacts to cultural resources would be none to low.

- The Big Eddy-Ostrander, No. 1 transmission line is eligible for listing on the National Register of Historic Places; however, a historic resources evaluation determined that the proposed project activities would not impact the historical integrity of the line.
- Segments of The Barlow Road and the West Fork Railroad Grade were documented in the Area of Potential Effects. Tree removals near these resources would be felled away from The Barlow

Road and West Fork Railroad Grade, and access road improvements would occur within the existing road prism, to avoid adverse effects.

- A cultural monitor would be onsite during construction at certain locations to avoid impacts.
- A Post-Review Discovery Procedures protocol would be followed in the event of inadvertent discoveries of cultural resources.

DETERMINATION

Based on the information in the EA, as summarized here, BPA determines that the Proposed Action 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.

Finally, consistent with Department of Energy's regulations in 10 Code of Federal Regulations (CFR) § 1022 *et seq.* (Compliance with Floodplain and Wetland Environmental Review Requirements), the Proposed Action would not result in significant impacts to any wetlands as referenced above and presented in Chapter 3 of the EA. Consistent with 10 CFR § 1022.12 and 1022.13, all impacts to floodplains from the Project have been assessed and proper notification provided. As discussed in 10 CFR § 1022.14, Chapter 2 of the Final EA includes a description of the Project Action; the alternatives; and proposed mitigation measures to avoid and mitigate any potential impacts from these actions.

Issued in Portland, Oregon.

SCOTT G. ARMENTROUT
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Date