Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: McNary-Roundup No. 1 Transmission Line Rebuild Project

Project Manager: Rusty Ludt – TIPL-TPP-1

Location: Umatilla County, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B4.13 Upgrading and Rebuilding Existing Powerlines

Description of the Proposed Action: BPA proposes to rebuild an existing transmission line, the approximately 38.5-mile-long McNary-Roundup No. 1, 230-kilovolt (KV) wood-pole transmission line in Umatilla County, Oregon (see website for interactive map *www.bpa.gov/nepa/mcnary-roundup*). The line begins at BPA's McNary Substation in Umatilla, Oregon, and ends at BPA's existing Roundup Substation near Pendleton, Oregon. The project would replace wood-pole structures that support the transmission line and other line components and enhance the access road system.

Along the line, the work would include:

- Removing and replacing all existing wood-pole line structures with new 230-kV, H-frame pole structures of similar construction (318 structures: 275 two-wood-pole; 2 two-steel-pole; 37 three-wood-pole; and 4 three-steel-pole), complete with new conductors, steel crossarms, cross braces, guy wires, counterpoise, insulator hardware assemblies, and overhead ground wire (OHGW) for the entire length of the line.
- Replacing 24 structures in new, shifted locations greater than 50 feet from the current structure to meet design requirements for conductor spans and ground clearance or to reduce impacts to sensitive resources.
- Protecting (and not replacing) two existing lattice-steel towers.
- Managing vegetation and removing danger trees on the existing project transmission line right-of-way (ROW) corridor and access roads, as necessary, for construction access and safe and reliable operation of the rebuilt line.
- Maintaining and improving gravel access roads along the project line corridor including about 16 miles of road improvements, 12 miles of road reconstruction, and 4 miles of new gravel access roads.
- Constructing 54 permanent structure landings.
- Using temporary laydown areas, material yards, and tensioning sites for pulling and tensioning conductors and OHGW.
- Using temporary landing zones and laydown areas for helicopters to install OHGW, bird diverters, and marker balls. Helicopters may also be used to transport old structure poles offsite after removal in areas of steep terrain or near wetlands and streams.

- Installing, improving, repairing, or replacing 31 gates, 11 culverts, and 22 fords.
- Removing existing rigid jumpers and installing new seismic risers at McNary Substation and Roundup Substation inside bays impacted by the transmission line rebuild. The existing rod gaps would also be replaced with new surge arresters. The surge arresters would require standard concrete footings and would be constructed in previously disturbed areas of the existing substation yard. Excess topsoil would be disposed of in a BPA approved location that meets state and federal regulations to prevent the spread of hazardous materials.

Replacement of 318 230-kV structures would result in approximately 110 acres of temporary disturbance and 4 acres of permanent disturbance. Relocation of 24 structures would temporarily impact approximately 1.4 acres. Pulling/tensioning sites and laydown yards would result in up to approximately 75 acres and 11 acres of temporary impacts, respectively, with no permanent impacts. Combined road activities would cause about 83.4 acres of temporary impacts and 6.8 acres of permanent impacts. BPA would implement various impact minimization measures to reduce project-related impacts (see Attachment A).

BPA determined that it would be most cost-effective to rebuild most of the existing transmission line with new wood pole structures, same as existing, to continue to provide safe and reliable power to customers. The transmission line would continue to operate at 230-kV and be rebuilt in the existing ROW with new wood poles and updated components. A more detailed project description can be found in the McNary-Roundup Resource Report at http://www.bpa.gov/nepa/mcnary-roundup.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and the current *DOE National Environmental Policy Act (NEPA), Implementing Procedures*, BPA has determined the following:

1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

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

DOUGLAS CORKRAN

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Douglas Corkran
Environmental Protection Specialist

Concur:

KATEY GRANGE

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Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

Categorical Exclusion Environmental Evaluation

This evaluation 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.

Proposed Action: McNary-Roundup No. 1 Transmission Line Rebuild Project

Project Site Description

The McNary-Roundup No. 1 rebuild project area passes through a lightly populated, arid upland area roughly parallel to the Umatilla River valley between Umatilla and Pendleton, OR. The terrain consists of gently rolling hills with few steep slopes except where the transmission line crosses from one side of the Umatilla River valley to the other. The western half of the line passes through light industrial and rural residential areas near Umatilla, Hermiston, and Stanfield, while the middle section is mostly irrigated farmland or dryland wheat fields. The eastern half of the line is mostly rangeland with some dryland wheat farming. Landowners and managers within the project corridor include the Bureau of Land Management (BLM) – Baker Field Office Vale District, Bureau of Reclamation (BOR) – Columbia-Pacific Northwest Region Columbia-Cascades Area Office, and United States Army Corps of Engineers (USACE) – Walla Walla District.

Soils are generally fine loess with no rocky outcroppings and mostly grassy or shrub steppe vegetation outside of cultivated croplands. Almost no trees are present in the project area. Streams in the project area are predominantly intermittent or ephemeral, although some canals and the Umatilla River are crossed as well as several perennial streams on the eastern section of the line.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: Replacement structure types would be similar to the existing wood pole structures, and the transmission line would retain its current alignment, thus the line's visual uniformity would remain, and its integrity would remain intact. Therefore, no adverse effects to the historical nature of the existing transmission line would occur. The project design was refined to avoid physical impacts to the National Register of Historic Places (NRHP)-eligible Oregon Trail Corral Springs Segment. No other NRHP-eligible built-environment historic properties have the potential to be adversely affected by the project. The project would also avoid adverse impacts to two eligible sites and four unevaluated sites by marking buffered avoidance areas and implementing lathe and flagging to prevent access to these areas. Additionally, archaeological monitoring would occur when project-related ground-disturbing activities are within 200 feet of the four unevaluated sites. Unknown cultural resources could be inadvertently discovered during construction; adherence to appropriate mitigation measures would ensure that any previously undiscovered resources found would be managed properly to minimize disturbance or destruction.

Section 106 consultation with the BLM – Baker Field Office Vale District, BOR – Columbia-Pacific Northwest Region Columbia-Cascades Area Office, Confederated Tribes of the Umatilla Indian Reservation, Oregon SHPO, and USACE – Walla Walla District was initiated on November 24, 2025, and was completed on December 24, 2025 with a determination that the project would have no adverse effect to historic resources. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to historic and cultural resources. Impacts to cultural resources would be **no to low**.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: The project area is mostly gently rolling hills with few steep slopes or other geologic hazard areas that would be subject to erosion or instability. The area does have erodible loess soils and alkali soils that can migrate off-site if disturbed and under the right conditions. The Proposed Action has the potential to temporarily impact an estimated 110 acres of structure work areas where soils would be subject to erosion and compaction, with an additional 4 acres permanently converted from natural or disturbed vegetation into compacted soil and gravel landings. Approximately 83.4 acres of soils would be temporarily disturbed to improve or reconstruct the existing access road system. Most work on existing roads would not result in new permanent soil impacts because the roads already exist, and soils are already compacted and/or covered with gravel but some soils on roadbed shoulders would be temporarily impacted by vegetation management, grading, shaping, adding gravel, and drainage features. In addition, the Proposed Action would construct 4.0 total miles of new roads totaling approximately 6.8 acres of permanent disturbance area, mainly by placing new road rock and grading the soil surface through open areas. Where possible, access roads are designed in areas that have been previously disturbed to avoid impacts to non-disturbed areas.

An area of alkaline soils was reported by a landowner as being present in mile 38, on the west side of Tutuilla Creek. Soils at this location are silt loams and may also be classified as alkaline, as the landowner describes, if the pH is high and unique physical and chemical properties are observed. Alkaline soils can have weak soil structure, and poor infiltration capacity. Alkaline soils are prone to swelling, ruts, and compaction when saturated. For the identified area of alkali soils, construction crews would contact the landowner before entry to review work areas and would perform work when the ground is dry to minimize rutting and damage to fragile soils (see Attachment A). The disturbed footprint of work areas would be minimized and vehicle traffic kept to a minimum to further reduce impacts. Revegetation with native vegetation suitable for alkaline soils would take place following construction.

To manage the erodible loess and alkali soils, BPA would use erosion control best management practices (BMP) (e.g., silt fences, straw wattles, and other sediment control measures) and would mulch revegetated areas after ground disturbing activities are complete. Whenever possible, contractors would work in dry conditions and use dust control measures such as using a water truck to control fugitive dust. Peak construction work would be conducted during the dry season. With BMP's and timing of construction, impacts to soil and erosion from structure replacement and landing construction would be **low** due to the relatively small acreage affected within the existing line corridor. Impacts remaining after mitigation would include small areas of soil compaction in work areas, reduced soil productivity around structures and along access roads, and increased potential for minor amounts of soil erosion in areas with steep slopes. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to geology and soils. Overall, impacts to soil and erosion from the Proposed Action would be **low**, and the potential impacts relating to geologic hazards would be **no to low**.

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

Potential for Significance: No with Conditions

Explanation: Vegetation surveys in the project area identified primarily cheatgrass, grey and green rabbitbrush, yellow star thistle, bulbous bluegrass, sagebrush, weedy herbaceous species, and agricultural crops. At the 318 structure replacement sites, work disturbance areas totaling approximately 110 acres of vegetation could be temporarily crushed or removed with approximately 4 acres of permanent vegetation loss for the towers and guy anchors. At pulling and tensioning sites, up to approximately 75 acres of vegetation would be temporarily impacted by crushing or removal to create an area to set up equipment. Access road improvements and reconstruction would temporarily crush or remove approximately

83.4 acres of vegetation. Approximately 6.8 acres of vegetation loss would occur as a result of 4.0 miles of new road construction, which would permanently convert existing surface vegetation to gravel road surface. This more impactful development of new access roads would occur in about 50 percent sagebrush steppe, 30 percent grassland, and 20 percent agriculture land. Most impacts to vegetation would be temporary and **low**, but new road construction would be permanent and cause **moderate** impacts to vegetation as it would not be expected to reestablish in these areas.

During and after construction, existing noxious and undesirable weed populations could spread and colonize disturbed areas. Construction equipment, vehicles, workers, and materials contaminated with seeds, roots, and other weed parts could spread weeds from one work area to another. Bare, disturbed, and compacted soils are vulnerable to weed invasion through natural dispersal such as wind-blown seeds. If allowed to establish, weeds could displace native plants, reducing biodiversity and degrading vegetative communities, whether natural or managed.

Minimization measures and BMPs would be used to reduce or avoid impacts to vegetation in work areas and would also limit potential spread or proliferation of weeds. BMPs include revegetation, inspecting vehicles before entering construction areas, remaining on established roads, and using weed wash stations or other appropriate equipment cleaning measures for construction equipment. Impacts to noxious and undesirable weeds from construction activities and disturbance areas would be low with use of BMPs. Temporary and long-term soil compaction would reduce soil productivity around structures, landings, and along access roads and could make it difficult for native species to recover in those areas, if present. However, all temporarily disturbed areas would be returned to their original, pre-construction state, with site restoration and revegetation measures conducted before or at the beginning of the first growing season following construction. Disturbed areas would be revegetated with native grasses, forbs, or shrubs to ensure appropriate vegetation coverage and soil stabilization during the optimal seeding window. With restoration and revegetation measures, the temporary and potential long-term impacts of soil compaction would be lessened. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to plants. Overall, the Proposed Action would result in **low to moderate** impacts to vegetation.

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

Potential for Significance: No with Conditions

Explanation: Approximately 40 percent of the 38.5-mile length of the line is in active agricultural lands or other areas with low species diversity and limited habitat structural complexity (i.e., developed properties or pastureland) with the remaining areas consisting primarily of arid sagebrush steppe (about 35 percent) and grassland (about 25 percent). Common wildlife that may occur in the project area includes mule deer (*Odocoileus hemionus*), bobcats (*Lynx rufus*), and black-tailed jackrabbits (*Lepus californicus*), coyotes (*Canis latrans*) American badgers (*Taxidea taxus*) and various ground squirrel species. Raptor species such as bald eagles (*Haliaeetus leucocephalus*), golden eagles (*Aquila chrysaetos*), red-tailed hawks (*Buteo jamaicensis*), Ferruginous hawks (*Buteo regalis*), ospreys (*Pandion haliaetus),* great horned owls (*Bubo virginianus*), northern harriers (*Circus hudsonius*), and prairie falcons (*Falco mexicanus*) are also present. Endangered Species Act (ESA)-listed species possibly occurring in the project area include yellow-billed cuckoo (*Coccyzus americanus),* monarch butterfly (*Danaus plexippus*), Suckley's cuckoo bumble bee (*Bombus suckleyi*), California condor (*Gymnogyps californianus*), and gray wolf (*Canis lupus*). Of these, the only likely species to occur in the project area would be the monarch butterfly, as several populations of its milkweed host plant were observed in the project area. BPA consulted with US Fish and Wildlife Service (USFWS) under Section 7 of the ESA for a may affect, not likely to adversely affect determination for yellow-billed cuckoo, California condor, monarch butterfly, and Suckley's cuckoo bumble bee. USFWS issued a letter of concurrence with these determinations on September 17, 2025.

Further, BPA completed field surveys for sensitive species listed as threatened or endangered by the state of Oregon, including Washington ground squirrel (WAGS;

Urocitellus washingtoni) and burrowing owl (*Athene cunicularia*). Field surveys found that there is little suitable habitat within or near the project corridor for WAGS and no individuals were observed during surveys. Additionally, there is minimal suitable habitat for burrowing owls, although one pair was observed during field surveys.

Impacts from vegetation clearing or disturbance could cause incidental injury or mortality to terrestrial wildlife species or temporarily displace them from habitat areas. Habitat impacts would be temporary and relatively insignificant compared to the current land uses in the habitat adjacent to the transmission ROW and access roads. Displacement or disturbance to terrestrial wildlife species and birds from noise and construction activities would vary depending on the proximity and duration of the noise and activity. Most wildlife species sensitive to human disturbance and noise, including birds and mammals, are highly mobile and would avoid temporary construction disturbance, but return once construction is complete. Project construction activities would generally be conducted during daylight hours, and noise disturbance would be temporary. Depending on requirements from Oregon Department of Transportation (ODOT), nighttime work might be required to construct the crossing over I-84 in mile 14. Nighttime work would last for three nights and would be conducted from 8pm to 6am. Typical light plants would be used to perform work, and lights would be towed by vehicles and removed from site daily. BMPs such as traffic control plans, advanced warning signs, and temporary speed limits would be implemented to reduce potential impact to local wildlife. Noise from nighttime work would not have any effects to ESA-listed species as the location of nightwork is along I-84 where there is no potential habitat or potential for species occurrence. Permanent impacts to wildlife would be limited to minor removal of habitat from vegetation clearing.

Mitigation measures and BMPs would be used to reduce or avoid impacts to wildlife, including timing restrictions in some locations, avoiding milkweed, and the placement of bird flight diverters on the transmission line spans that have a high risk to bird collision. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to wildlife and habitat. Overall, the Proposed Action would result in **low** impacts to wildlife.

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

Potential for Significance: No with Conditions

Explanation: The project area is mostly in upland areas with very few streams, rivers, or other waterbodies. Those waterbodies that do exist are spanned by the existing transmission line. No substantial construction activities or in-water work are necessary in streams or rivers. The Umatilla River and three perennial streams are crossed by the project, but no work would occur in them. One new ford would be installed in an intermittent stream at an existing access road that would be reconstructed. Work would be completed during the dry season when no water is present. There is a **low** potential for direct impacts to surface or groundwater quality during construction from the accidental release of chemicals used during construction (e.g., fuels, lubricants, solvents).

There is **low** potential for impacts to floodplains. One transmission structure and two temporary guard structures would be replaced within a 100-year floodplain. One structure currently within the Birch Creek floodplain would be relocated to an area outside of the floodplain resulting in removal of material from the floodplain. The transmission line ROW would not change from existing where it spans over known floodplains.

The potential for impacts to fish would be **low**. Any impact to aquatic species would be indirect and temporary, primarily during construction. Most stream crossings for the project are located on seasonal intermittent or ephemeral drainages where fish are not present. BMPs, including erosion and sediment control measures at structure and access road work areas, would prevent sediment from entering potential fish streams or habitat, avoiding impacts from construction activities.

BPA determined that the proposed action would have no effect on bull trout (*Salvelinus confluentus)* or its designated critical habitat.

Project actions would be within the scope of BPA's existing programmatic consultation, National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service's (NMFS) 2016 Programmatic Biological Opinion for Standard Local Operating Procedures for Endangered Species for BPA's transmission line and access road actions in Oregon, Washington, and Idaho (SLOPES PBO) to address potential effects on listed anadromous species. The BPA SLOPES PBO contains the analysis of the action's effects on Essential Fish Habitat (EFH), and the project would be consistent with that analysis. BPA obtained approval of the Project Action Notification from National Marine Fisheries Service (NMFS) on August 25, 2025. Although no impacts to fish are anticipated, BPA submitted a project notification form under SLOPES due to work that is proposed near streams and rivers with ESA-listed fish populations. The notification form was submitted as a preventative measure in case flooding or other extreme weather events during construction occur, which have the potential to impact fish.

Project elements, including access roads, new culverts, culvert repairs, or replacements would be in ephemeral or intermittent non-fish-bearing locations without the potential for direct impacts to fish. Culvert installation and repairs would maintain or improve hydrologic connectivity after construction; therefore, impacts would be **low**. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to water resources, floodplains, and fish. Overall, impacts to water resources, floodplains, and fish would be **low**.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: Two existing transmission line structures currently in two separate wetlands would be permanently removed and relocated. The permanent wetland impacts from removal of these structures would be mitigated on site by installing the replacement structures outside of the impacted wetlands and backfilling the remaining holes left after structure removal with native soil and rock, which would eventually be reclaimed by the associated wetlands. No new line structures would be installed in wetlands. One wetland area would be temporarily impacted by a pulling and tensioning site. Two wetlands would be temporarily impacted as a result of temporary direction of travel roads, covering an area up to 0.02 acre for temporary impacts from placement of temporary timber mats and geotextile fabric. Potential temporary wetland impacts for direction of travel routes with no existing roads would be limited by using wetland mats, working during the dry season, and using erosion control measures prior to work. The project was designed to avoid and minimize potential impacts to wetlands and waters and further mitigation and avoidance measures would be implemented during construction. Most construction would occur during the dry season, which would reduce the potential for runoff, erosion, and rutting of wetlands. Minor and temporary impacts to wetland soils and vegetation could occur from the use of timber mats during the removal of the two transmission towers in wetlands and the use of the direction of travel roads in wetlands. All temporary disturbance areas in wetlands would be reseeded with an appropriate native seed mix. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to wetlands. Overall, impacts to wetlands would be **low**.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: The project area is mostly in arid upland areas with no shallow aquifers. Oregon Department of Environmental Quality (DEQ) has designated the Lower Umatilla Basin as a Groundwater Management Area due to nitrate-nitrogen concentrations that exceed federal safe drinking water standards. There is a low potential for direct impacts to surface or groundwater quality during construction from the accidental release of chemicals used during construction (e.g., fuels, lubricants, solvents), the disturbance of existing creosote-treated wood poles and creosote-contaminated soil excavated from existing structure holes, and the leaching of wood preservative, pentachlorophenol (PCP), from new PCP-treated wood poles into the ground. Minimization measures and BMPs would be used to

reduce the spread of PCPs and petroleum products, including BMPs for proper handling and disposal of creosote-treated wood poles and creosote-contaminated soils; spill prevention, containment, and cleanup; wood-pole storage methods to minimize the risk to groundwater from the accidental release of hazardous chemicals; and, installation of pole wraps on structures installed within 50 feet of streams, within a wetland, or within the 100-year floodplain. No nitrate- or nitrogen- containing materials would be used during or after construction so the project would not contribute to the existing high concentrations of those pollutants. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to groundwater and aquifers. With BMPs, impacts to groundwater and aquifers would be **none to low**.

8. Land Use and Specially-Designated Areas

Potential for Significance: No with Conditions

Explanation: The existing transmission line would be rebuilt in the same location as the existing line. Current or future land uses in the project corridor would not change. Landowners and managers within the project corridor were contacted to discuss the project, including the BLM – Baker Field Office Vale District, BOR – Columbia-Pacific Northwest Region Columbia-Cascades Area Office, and USACE – Walla Walla District.

The Hermiston Airport is located near the western part of the line and expressed concerns that the project may have an effect on aircraft operations. BPA has coordinated with the Federal Aviation Administration and the airport to design the project to meet federal requirements.

Minimal, temporary disturbance to land use, such as crop production and grazing operations, during construction may occur from construction activities. These potential impacts would be short-term and infrequent and minimized through coordination with local landowners and businesses to avoid impacts as much as practicable.

There are no Natural Resources Conservation Service (NRCS) conservation easement properties in the project corridor, but there is a Conservation Reserve Program property that borders the ROW but would not be impacted by the project. About 0.7 mile of the ROW in line miles 33 and 34 is located on land that has a BPA Deed of Conservation and Restoration Easement. The proposed rebuild and operation of the transmission line and associated access roads are allowable uses under the terms of the conservation easement and no change to the lands under the conservation easement would occur outside of the existing right-of-way for this project.

Therefore, existing and future land uses would not substantially change in the project corridor or access road system. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to land use and specially-designated areas. Impacts to land use and specially-designated areas would be **low**.

9. Visual Quality

Potential for Significance: No

Explanation: Access road work may also cause noticeable, but relatively minor changes to visual quality in certain areas where new gravel is placed, roads are reconstructed, or new roads are installed; these changes would be visually consistent with the various farm roads and access roads in the project area. The new transmission line would look very similar to the existing one, as it would be constructed with similar materials and in the same location. Some temporary visual impacts would occur during construction when vehicles, equipment and materials are on site. The new transmission line may have a darker color and slightly more visible hardware, but overall the changes to the visual nature of the transmission line would be a minor and **low** change to the overall visual quality of the area.

10. Air Quality

Potential for Significance: No with Conditions

Explanation: Construction equipment and vehicles would produce emissions and fugitive dust during construction and would be similar to typical agricultural and land-use activities already occurring in the area. BMPs to minimize dust generated by project equipment and helicopters would be used. Any impacts to air quality would be localized and temporary. Once construction is complete, any bare soils caused by construction would be re-seeded. **No** long-term impacts to air quality would occur. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to air quality. Impacts to air quality would be **low to moderate** from temporary emissions and dust during construction.

11. Noise

Potential for Significance: No with Conditions

Explanation: Temporary noise disturbance from construction equipment and vehicles would occur and be similar to typical agricultural and land-use activities already occurring in the area. Noise disturbance from helicopters or drones during stringing operation and pole removal may be more impactful, but would be temporary and short-term, typically less than a few hours in any location. Nighttime work might be required in one location (transmission line crossing over I-84 in mile 14), which would occur from 8pm to 6am and last for 3 nights; however, there are no noise-sensitive receptors nearby that would be impacted. See Attachment A for a full list of minimization measures, including limiting daylight hours, that would be implemented to reduce and minimize project-related impacts to noise. Impacts to noise would be **low to moderate** during construction.

12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: Potential temporary impacts to public health and safety during construction could include hazardous materials, construction hazards from heavy equipment use, power outages, and property damage. Following construction, the potential for power-delivery interruptions and safety issues would be reduced during operations and maintenance of the rebuilt transmission line which would have fire-resistant pole wraps and overhead ground wire along the entire line for lightning and grounding protection. The Proposed Action would result in little or no measurable change to the average strength of electric fields (EMF) either in ROW or at the edge of ROW. See Attachment A for a full list of minimization measures that would be implemented to reduce and minimize project-related impacts to human health and safety. Impacts to human health and safety would be **no to low**.

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: N/A

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

Explanation: N/A

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: N/A

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: N/A

Landowner Notification, Involvement, or Coordination

Description: BPA solicited public comments to inform the environmental review from February 22, 2024, to March 23, 2024. On February 22, 2024, BPA mailed letters to potentially interested and affected persons, agencies, tribes, and organizations. The public letter provided information about the project, requested comments on issues identified by the public, and described how to comment (via mail, fax, telephone, and BPA's website). The project's resource report contains a summary of the comments received and BPA's response to comments. BPA would continue to coordinate with underlying landowners and interested parties throughout construction.

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

Signed: DOUGLAS CORKRAN

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Douglas Corkran
Environmental Protection Specialist

Attachment A: Project Minimization Measures

A.1 Best Management Practices and Minimization Measures

Best management practices (BMPs) and minimization measures have been identified for the Proposed Action. Some of these measures are design features that BPA typically uses or that have been incorporated into the original design of this proposed project. Other measures were identified as a result of agency consultation and are intended to reduce or eliminate potential impacts from the Proposed Action on resources.

A1.1. Soils and Geologic Hazards

- Stabilize permanent disturbance areas by applying a weed-free gravel top layer to the roadways.
- Conduct project construction, including tree removal, during the dry season when rainfall, runoff, and stream flow are low to minimize erosion, compaction, and sedimentation to the extent practicable.
- Contact geotechnical specialists if geotechnical issues such as new landslides arise during construction.
- Install appropriate erosion-control devices, where needed, to minimize soil transport.
- Retain vegetative buffers, where practicable, to prevent sediments from entering waterbodies.
- Include water control structures on reconstructed and improved access roads using low grades, water bars, and drain dips to help control runoff and prevent erosion.
- Properly space and size culverts on access roads.
- Apply water from water trucks on an as-needed basis to minimize dust and reduce erosion due to wind.
- For the identified area of alkali soils:
    - Contact the landowner before entry to review work areas.
    - Perform work when the ground is dry to minimize damage to fragile soils.
    - Minimize the disturbed footprint of work areas and vehicle traffic to further reduce impacts and keep vehicles on designated routes.
    - Revegetate with native vegetation suitable for alkali soils.
- Revegetate disturbed areas to help stabilize soils as soon as work in that area is completed and appropriate environmental conditions exist, such as moderate temperatures and adequate soil moisture.
- Where vegetation is used for erosion control on slopes steeper than 2:1, use a tackifier seed and mulch so the seed does not wash away before germination and rooting.
- Inspect revegetated areas to verify adequate growth and implement contingency measures, as needed.
- Inspect and maintain access roads and cross-drains to ensure proper function and nominal erosion levels after construction.
- Use pole wraps for placement of any chemically treated poles in wetlands and the 100-year floodplain and near streams. Install pole wraps per the following requirements: chemically treated transmission poles placed within 50 feet of a stream, in a wetland, or within the 100-year floodplain must be encapsulated or wrapped to at least 18 inches above the ground or

channel surface with an appropriate material to prevent leaching of chemicals. In areas with a high likelihood of abrasion, poles must be equipped with a wear strip.

A1.2. Vegetation

- Use the existing road system, as practicable, to access structure locations.
- Minimize the construction area and disturbance to vegetation to the extent practicable, especially in monarch butterfly habitat (avoidance of patches of milkweed), wetlands, and waterbody crossings.
- Locate materials storage and staging areas in previously disturbed areas, where feasible.
- Conduct as much work as possible, including tree removal, during the dry season to minimize erosion and soil compaction.
- Conduct tree removal in a manner that minimizes disruption to remaining plants and shrubs.
- Cut trees and leave existing root systems intact to help prevent erosion.
- Return temporarily disturbed areas to their original, pre-construction contours and conduct site restoration and revegetation measures before or at the beginning of the first growing season following construction. Revegetate disturbed areas with grasses, forbs, or shrubs to ensure appropriate vegetation coverage and soil stabilization during the optimal seeding window.
- Keep pulling/tensioning and construction equipment inside the transmission line ROW for pulling/tensioning sites located on ROW to minimize impacts to surrounding, previously undisturbed vegetation. Prior to construction, identify noxious weed infestation areas for avoidance (as practicable).
- Implement measures to avoid spreading noxious or undesirable weeds including inspecting equipment for mud or seeds and cleaning before entering work areas, driving on established roads, installing and using weed wash stations, and other appropriate equipment cleaning measures, such as using commercial carwashes.
- Avoid impacts to crops or agricultural production, when practicable, and minimize unavoidable impacts by developing and implementing a construction damage settlement plan. The plan would document standard fees for damage because of construction activities such as compaction, rutting, and crop damages based on commodity type.

A1.3. Water Resources, Floodplains, and Fish

- Restrict construction vehicles and equipment to access roads and designated work areas.
- Use pole wraps and culvert footings on structures located within 50 feet of a wetland, stream, or floodplain, as outlined under soils and geologic hazards.
- Construction activities in or near potential water drainages should be done in the dry season when no water is present, including culvert modifications and road maintenance.
- Prepare and implement a storm water pollution prevention plan.
- Install erosion-control measures (e.g., silt fences, straw wattles, and other sediment control measures) prior to work in or near floodplains and streams. Inspect and maintain, as necessary, to ensure their continued effectiveness until soils become stabilized.
- Operate equipment from the top of a streambank and conduct work outside of the active stream channel, where possible.
- Limit the placement of fill for access road work in floodplains to the minimum required.
- Install cross-drains per BPA access road design specifications.

- Design culverts (non-fish drainages) for the 100-year storm event to minimize future maintenance needs.
- Return temporary disturbance areas for culvert and road work to pre-construction contours: mulch, seed, and plant as per plans and specifications.
- Dispose of excess material generated from access road work in a stable upland site (in gentle terrain more than 150 feet from waterbodies or wetlands) approved by the BPA environmental lead, smooth to match adjacent grades, and seed for stability. In steep terrain or near waterbodies or wetlands, haul excess material off site.
- Confirm that any vehicle or mechanized equipment to be operated within 150 feet of water resources is clean (e.g., power-washed) and does not have fluid leaks prior to contractor mobilization of heavy equipment to site; inspect equipment and tanks for drips or leaks daily and make necessary repairs within 24 hours.
- Store, fuel, and maintain all vehicles and other heavy equipment (when not in use) in a designated upland staging area located a minimum of 150 feet away from any stream, waterbody, or wetland, or where any spilled material cannot enter natural or manmade drainage conveyances.
- Maintain emergency spill control materials, such as oil booms and spill response kits, on-site always and ready for immediate deployment.
- Contain petroleum product spills immediately, eliminate the source, and deploy appropriate measures to clean and dispose of spilled materials in accordance with federal, state, and local regulations; and contact the BPA environmental lead.
- Revegetate disturbed areas using a slow-release fertilizer.
- Do not apply surface fertilizer within 50 feet of any wetland or water body.
- Remove all erosion control structures when the project is complete, and site is stabilized and vegetated.
- Obtain all necessary permits for water drafting sites (locations where the contractor may fill water trucks) and locate to minimize adverse effects on stream channel stability, sedimentation, and in-stream flows.

A1.4. Wetlands

- Use existing access roads as practicable to access structure locations.
- Use temporary equipment mats when working in wetlands and drive vehicles and equipment across wetlands only during the dry season.
- Unless they are part of authorized permanent fill, use removable pads or mats to prevent soil compaction at all construction access routes through wetlands or project work areas in wetland areas.
- Comply with the applicable Clean Water Act regulations and permit conditions for all work in wetlands.
- Install erosion control measures prior to work in or near wetlands (e.g., silt fences, straw wattles, and other sediment control measures). Inspect and maintain as necessary to ensure their continued effectiveness until soils become stabilized.
- Avoid mechanized equipment usage in wetlands except where no practicable alternative exists.
- Store fuel and maintain all vehicles and other heavy equipment (when not in use) in a designated upland staging area located a minimum of 150 feet away from any stream,

waterbody, or wetland, or where any spilled material cannot enter natural or manmade drainage conveyances.

- Confirm that any vehicle or mechanized equipment operated within 150 feet of wetlands is clean (e.g., power-washed) and does not have fluid leaks prior to contractor mobilization of heavy equipment to site; inspect equipment and tanks for drips or leaks daily and make necessary repairs within 24 hours.
- Dispose of excess material generated from access road work in a stable upland site (in gentle terrain more than 150 feet from waterbodies or wetlands) approved by the BPA environmental lead, smooth to match adjacent grades, and seed for stability. In steep terrain or near waterbodies or wetlands, haul excess material off site. Remove any temporary equipment mats and revegetate.
- Remove all erosion control structures when the project is complete, and soils are stabilized and vegetated.
- Restore all temporary disturbance areas to original contours and de-compact, if necessary.
- Reseed all temporary disturbance areas in wetlands with a wetland specific seed mix and monitor revegetated wetland areas to ensure adequate cover.
- Do not apply surface fertilizer within 50 feet of any wetland or water body.
- Use pole wraps and culvert footings on structures located within 50 feet of a stream or within a wetland or the 100-year floodplain as outlined under soils and geologic hazards.

A1.5. Wildlife

- Install bird diverter devices in areas with potentially high avian use as determined in final design (Table 1-3).
- Restore areas disturbed by construction to pre-construction condition, as much as practicable.
- Remove or store inside secure containers food and food-related materials along with other trash generated during construction. Maintain project sites free of trash and remove food-related garbage regularly; do not feed wildlife or leave food or trash where wildlife can access it.
- Locate staging areas in previously disturbed or graveled areas to minimize soil and vegetation disturbance, where practicable.
- Conduct pre-construction nest surveys to determine the presence of any raptor or other bird nests in structures where work would occur. Remove nests outside of the nesting season if removal is needed.
- Avoid bald eagle disturbance during the breeding season from January 1 through August 31 from construction activities within 660 feet of active bald eagle nests if the activity is visible from the nest or 330 feet if the activity is not visible from the nest.
- Avoid bald eagle disturbance during the breeding season from January 1 through August 31 by avoiding helicopter use within a 1,000-foot buffer around bald eagle nest sites (occupied or unoccupied).
- Remove trees and clear vegetation during the non-breeding season to avoid disturbing or displacing nesting birds (for most birds, this is between August 15 and March 31). Restrict helicopter use and heavy equipment operation for construction during this period near nesting sites and buffers, as necessary.

A1.6. Cultural Resources

- Avoid access road improvements and structure work areas within the boundary of the Oregon Trail Corral Springs Segment.
- Avoid adverse impacts to the two eligible sites (35UM00398 and 35UM0039) and four unevaluated sites (35UM00560, Site-A-2, Site-B-3, and Site-B-4) by marking buffered sensitive avoidance areas on project maps and implementing exclusion measures like lathe and flagging to prevent access to areas.
- Provide archaeological monitoring during Project-related ground-disturbing activities that occur within 200 feet of the four unevaluated sites (35UM00560, Site-A-2, Site-B-3, and Site-B-4).
- Follow BPA's Post-Review Discovery of Cultural Material Procedure, which requires immediately stopping all work within 150 feet of an inadvertent discovery of cultural resources and immediately notifying the BPA archaeologist and BPA Project Manager. The BPA archaeologist will work with the State Historic Preservation Office (SHPO) and affected Tribes to assess the cultural material and determine the appropriate course of action.
- Stop all operations immediately within 300 feet of the inadvertent discovery of human remains or suspected human remains, or if any items suspected to be related to a human burial are encountered during project construction; secure the area around the discovery and immediately contact the BPA Project Manager, BPA archaeologist, and local law enforcement. The BPA archaeologist will work with the SHPO and affected Tribes to determine the appropriate course of action.
- Provide cultural resources awareness training to explain cultural resource-related avoidance and minimization measures to the BPA transmission line maintenance crew, construction contractors, and inspectors during preconstruction meetings.

A1.7. Noise, Public Health, and Safety

- Use sound-control devices on construction equipment with gasoline or diesel engines and limit construction noise to daylight hours (such as 7:00 a.m. to 7:00 p.m.) to reduce noise impacts.
- Use fire-retardant pole wraps on rebuilt structure wood poles to reduce potential damage or service interruptions from wildfires.
- Implement spill prevention and response BMPs to avoid, minimize, or mitigate impacts to public health and safety from the Proposed Action.
- Place plastic ground covers and concrete blocks to keep wood poles off the ground in material staging yards.

A1.8. Other BMPs

- Provide a construction schedule to the potentially affected landowners and interested parties.
- Maintain existing access to residences and other areas during construction.
- Coordinate with landowners and residents to ensure that access road work, gates, and construction and maintenance activities would minimize disruptions to agricultural operations.
- Compensate landowners for the value of any property damaged by construction activities, as appropriate.
- Use traffic safety signs and flaggers to inform motorists and manage traffic during construction activities on affected roads.
- Install permanent gates at selected locations to minimize unauthorized use of BPA access roads and unauthorized entry to BPA ROW.
- Provide traffic control where existing rural roadways are narrow to ensure traffic safety.

- Follow the applicable state, county, and city requirements for traffic control and lane closures.
- Use water trucks to control dust during construction, as needed.
- Keep all vehicles in good operating condition to minimize exhaust emissions.
- Turn off construction equipment during prolonged periods of non-use.
- Drive vehicles at low speeds (less than 15 miles per hour) on access roads and in the BPA ROW to minimize dust.
- Locate staging areas as close to construction sites as practicable to minimize driving distances between staging areas and construction sites.
- Locate staging areas in previously disturbed or graveled areas to minimize soil and vegetation disturbance, where practicable.
- Encourage the use of the proper size of equipment for the job to maximize energy efficiency.
- Recycle or salvage non-hazardous construction and demolition debris, where practicable.
- Dispose of wood poles at an appropriate waste-disposal facility in the local area, where practicable.
- Use local rock sources for road construction that meet road material and weed free standards, if possible.
- Focus security lighting at staging areas and the material storage yard inward to minimize spillover of light and glare.
- Maintain a clean construction site and remove all construction debris.