

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Transmission Line Marker Ball Replacement Phase III Project

**PP&A No.:** 4444

**Project Manager:** Dianne Wilson – TEPL-TPP-1

**Location:** Benton, Klickitat, Skamania Counties, Washington. Morrow, Sherman, Wasco, Jefferson, Klamath, Crook, Lake, Deschutes Counties, Oregon.

**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 seventeen transmission lines and overhead ground wire (OHGW) on one of those lines, in multiple counties in Washington and Oregon State. As part of BPA's wildfire mitigation effort, BPA noted that plastic and fiberglass marker balls can fail at their attachment point on conductor or ground wire, potentially igniting and falling to the ground to start wildfires. BPA would like to mitigate wildfire risk by completing replacements of the marker balls identified for Phase 3 before the 2022 wildfire season. Phase 3 construction is currently planned for March to July 2022.

BPA proposes to replace marker balls on the Ashe-Marion No. 2, Big Eddy-DeMoss No. 1, Buckley-Grizzly No. 1, Captain Jack-Malin No. 1, Grizzly-Summer Lake No.1, Grizzly-Captain Jack No. 1, John Day-Big Eddy No. 2, John Day-Grizzly No. 1, John Day-Grizzly No. 2, John Day-Marion No. 1, LaPine-Fort Rock No. 1, Malin-Hilltop No. 1, McNary-John Day No. 2, Ponderosa-Pilot Butte No. 1, Rock Creek-John Day No. 1, and Knight-Ostrander No. 1 lines utilizing Human External Cargo (HEC), or a crew suspended from a helicopter. For replacements on these lines, helicopter landing zones are necessary for helicopters to land and take off, as well as for staging crew and equipment. Access road improvements are not anticipated at this time. 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.

Additionally, OHGW replacement is required on the John Day-Grizzly No.2 line, span 25/1-25/2. Replacing the OHGW would be done using a puller and tensioner on either end of the section (structures 25/1 and 25/2), as well as a combination of line trucks, flat beds or trailers, and a front loader or crane.

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/ Treicia Albert*

Treicia Albert

Physical Scientist (Environmental)

Concur:

*/s/ Katey Grange*

Katey C. Grange

NEPA Compliance Officer

Date: March 15, 2022

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.

**Proposed Action:** Transmission Line Marker Ball Replacement Phase III Project

### Project Site Description

The project is located throughout the central section of Oregon from Sherman County in the north to Klamath County in the south, as well as a small section of south central Washington. The project area traverses mostly scrub/shrub and agricultural land and spans several river crossings. Work would occur on privately-owned lands and Confederated Tribes of Warm Springs lands in addition to lands managed by the US Army Corp of Engineers (Corps), and the US Bureau of Land Management. See Table 1 below for Township, Range, Section Number, and County information.

**Table 1. Township, Range, Section Number, and County Information**

Line Corridor	Spans(s)	Township, Range, Section	County, State
Ashe-Marion No. 2	51/3-51/4 52/5-53/1 53/1-53/3 55/1-55/2 56/4 - 57/1 127/3-127/4	T5N R24E Section 28 T5N R24E Section 33 T4N R24E Section C4 T4N R24E Section 8/T4N R24E Section 17 T4N R24E Section 20/T4N R24E Section 19 T4S R15E Section 11	Benton, WA Benton, WA Benton, WA Morrow, OR Morrow, OR Sherman, OR
Ashe-Marion No. 2	134/4-134/5	T4S R14E Section 27	Wasco, OR
Big Eddy - DeMoss No. 1	12/10-13/1	T1N R15E Section 23	Wasco/Sherman, OR
Buckley - Grizzly No. 1	20/6 - 21/1, 37/5-38/1	T7S R15E Section 23 T10S R15E Section 7/T10S R14E Section 12	Wasco , OR Jefferson, OR
Captain Jack - Malin No. 1	1/1-1/2 2/3 - 2/4,	T40S R12E Section 23 T40S R12E Section 24	Klamath, OR
Grizzly-Summer Lake No.1	18/5 - 19/1 35/1-35/2	T15S R15E Section 33 T18S R15E Section 21	Crook, OR
Grizzly-Captain Jack No. 1	34/4-35/1 86/5-87/1 173/5- 173/6	T18S R15E Section 21 T27S R15E Section 2/T26S R15E Section 35 T40S R12E Section 24	Crook, OR Lake, OR Klamath, OR
John Day - Big Eddy No. 2	4/5-5/1 7/3-8/1	T2N R16E Section 16/T2N R16E Section 15 T2N R16E Section 19	Sherman, OR

	9/4-10/1	T2N R15E Section 26/T2N R15E Section 26	
John Day-Grizzly No. 1	13/1-13/2 35/4-35/5 55/6-56/1	T1N R16E Section 35 T4S R15E Section 11 T7S R15E Section 23	Sherman, OR Sherman, OR Wasco, OR
John Day-Grizzly No. 2	12/5-13/1 24/3-24/4 25/1-25/2 30/1-30/2 31/1-31/2 31/4-32/1 32/3-33/1 35/4-35/5 37/2-38/1 42/5-43/1	T1N R16E Section 35 T2S R16E Section 20/T2S R16E Section 29 T2S R16E Section 29/T2S R16E Section 30 T3S R15E Section 13/T3S R15E Section 14 T3S R15E Section 24/T3S R15E Section 23 T3S R15E Section 26 T3S R15E Section 35 T4S R15E Section 11 T4S R15E Section 23/T4S R15E Section 26 T5S R15E Section 23/T5S R15E Section 14	Sherman, OR Sherman, OR Sherman, OR Sherman, OR Sherman, OR Sherman, OR Sherman, OR Sherman, OR Sherman/Wasco, OR Wasco, OR
John Day - Marion No. 1	12/1-12/2 15/2-16/1 30/6-31/1 64/2-64/3	T1N R15E Section 12/T1N R15E Section 1 T1N R15E Section 25/T1N R15E Section 25 T2S R14E Section 27/T2S R14E Section 34 T6S R10E Section 3/T6S R10E Section 4	Sherman, OR Sherman/Wasco, OR Wasco, OR Wasco, OR
LaPine-Fort Rock No. 1	4/5-4/6	T23S R11E Section 6	Klamath, OR
Malin-Hilltop No. 1	50/3-50/4	T43N R10E Section 29	Modoc, CA
McNary - John Day No. 2	61/3-62/1	T3N R19E Section 30/T3N R19E Section 29	Klickitat, WA
Ponderosa - Pilot Butte No. 1	11/7-11/8	T16S R13E Section 13	Deschutes, OR
Rock Creek - John Day No. 1	11/4-12/2 12/1-12/2	T3N R17E Section 29/T3N R17E Section 32/ T3N R17E Section 33	Sherman, OR Klickitat, WA
Knight-Ostrander No. 1	34/5-35/1	T3N R10E Section 10/T3N R10E Section 11	Klickitat/Skamania WA

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

**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 or No Adverse Effect to Historic Properties.

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.

Initiation letters were sent October 26, 2021, December 2, 2021, and February 9, 2022 to the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes and Bands of the Yakama Nation, the Nez Perce Tribe of Idaho, the Klamath Tribes, the Burns Paiute Tribe, the Confederated Tribes of the Warm Springs Reservation of Oregon Tribal Historic Preservation Office, the Corps of Engineers Portland District, Bureau of Land Management Prineville District, the Bureau of Land Management Lakeview District, the United States Forest Service Columbia River Gorge National Scenic Area, the Oregon State Historic Preservation Office, and the Department of Archaeology and Historic Preservation.

Concurrence on the proposed areas of potential effect was received from the Confederated Tribes and Bands of the Warm Springs Reservation of Oregon, the Confederated Tribes and Bands of the Yakama Nation, the Klamath Tribes, the Bureau of Land Management Lakeview District, the Department of Archaeology and Historic Preservation, and the Oregon State Historic Preservation Office between October 26, 2021 and November 30, 2021.

The impact of the proposed landing zones and pulling and tensioning sites was assessed through pedestrian survey by a consultant in November and December 2021 and February 2022. BPA sent no historic properties affected or no adverse effect to historic properties determinations between February 9, 2022 and February 15, 2022. The Nez Perce Tribe, the Klamath Tribes, the United States Forest Service Columbia River Gorge National Scenic Area, and Department of Archaeology and Historic Preservation concurred with the determinations of project effect between February 10, 2022 and March 11, 2022.

Monitoring or minimization measures are necessary for the implementation of the project as shown below under the notes section.

Notes:

- **Buckley-Grizzly No. 1** – A 10 meter buffer would be flagged around isolate AAR 2524-1i in Township 10 South, Range 14 East, Section 12 (BG1 LZ-1) prior to any project related activities. No project related activities will take place in this buffered area.
- **Rock Creek-John Day No. 2** – A cultural resources monitor would be present during work in the proposed LZ in Township 2 North, Range 17 East, Section 5 (RKCR-JDAY LZ-2) and within the boundaries of site 35SH169. The monitor would ensure all work is carried out within the previously graveled, leveled, and hardened areas of the previously existing staging area in this location, and all deposits on the margins of this previously existing staging area would be avoided.
- **LaPine-Fort Rock No. 1** – A 10 meter buffer would be flagged around isolate AAR 2524-1i in Township 23 South, Range 10 East, Section 1/Township 23 South, Range 11 East, Section 6 (LFR1 LZ-1) prior to any project related activities. No project related activities will take place in this buffered area.

## 2. Geology and Soils

Potential for Significance: No

Explanation: No ground disturbance is anticipated for the project.

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

Potential for Significance: No with Conditions

Explanation: Minimal disturbance to vegetation is anticipated. Vegetation may be crushed in those locations where equipment would be accessing marker balls or where access road improvements would occur. There would be no effect to ESA-listed plant species. No impacts to state or other sensitive species are anticipated.

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

- Drive on existing 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)**

Potential for Significance: No with Conditions

Explanation: In general, the project would have minimal impacts to wildlife and habitat related to temporary disturbance associated with elevated noise and human presence. There would be no impacts to ESA-listed wildlife species. No impacts to state-listed and other sensitive species.

Notes: The following minimization measures would be implemented to minimize impacts to wildlife and their habitat.

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

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

Potential for Significance: No with Conditions

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 species.

Notes: 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**

Potential for Significance: No with Conditions

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

Notes: 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**

Potential for Significance: No with Conditions

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

Notes: 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

Potential for Significance: No with Conditions

Explanation: Marker ball replacement at the John Day – Big Eddy No. 2 transmission line span 9/4 – 10/1 is located partially within the Columbia River Gorge National Scenic Area, designated as general management area A-1 (160) and Open Space. Marker ball replacement is considered routine transmission line maintenance and BPA notified the USFS CRGNSA office of the project. No change in land use would occur and project activities would not impact existing land uses, and there would not be any recreational or operational disruptions.

## 9. Visual Quality

Potential for Significance: No

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

Potential for Significance: No

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

## 11. Noise

Potential for Significance: No

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

Potential for Significance: No

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: 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 realty and environment staff have coordinated the proposed project activities with the Confederated Tribes of Warm Springs, US Army Corp of Engineers (Corps), US Bureau of Land Management, US Forest Service Columbia River Gorge National Scenic Area (CRGNSA) 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/ Treicia Albert

Treicia Albert – EPR -4  
Physical Scientist (Environment)

Date: March 15, 2022