Proposed Action: Routine Maintenance of Bonneville Power Administration Access Roads through 2027

Project Manager: Multiple

Location: Multiple locations in Idaho, Oregon, Washington, Montana, California, Nevada, Utah, and Wyoming

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

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to conduct routine maintenance on access roads providing access to electrical transmission infrastructure throughout the BPA service territory. Specifically, BPA proposes to conduct the following activities to maintain road surface integrity:

- **Access Road Surface Maintenance**: Light road grading, to include smoothing, reshaping, and filling irregularities; not to impact any native soil beneath imported fill. Rock would be added to existing road surfaces, approaches, and landings. Adding of rock no greater than 30 tons per 100 feet of road surface (approximately 4 inches deep) and filling potholes. When working on land not owned or managed by BPA, material and design guidelines set forth by land managers would be followed.

- **Drainage Feature Maintenance**: Clearing vegetation and debris through a combination of hand and mechanical methods from ditches, cross-drain culverts, and other drainage features. Repair of existing drain dips and water bars. Ditch maintenance immediately adjacent to access roads that maintains the existing width to depth ratio. Replacement of existing or destroyed cross-drain culverts within the access road bed. Replacement culverts would be of the same diameter, or smaller, than the existing or destroyed culvert, and would not require excavation greater than was necessary to install the original culvert. Cleaning the culvert bed would include removal of debris and would not affect the existing width to depth ratio. All preventative maintenance would be completed in a manner that minimizes disturbance, but restores engineered drainage features to their original capability, thus preventing larger scale washouts, landslides, and sedimentation into waterbodies.

- **Gate Replacements**: Removal of existing damaged or malfunctioning gates and replacement with new gate of similar type and color in same location as previous gate. Gate removal/replacement would not require excavation greater than was necessary to install the original gate.

- **Cattle Guard Repair/Replacements**: Cleaning/removal of debris from beneath cattle guard. Repair of damaged cattle guards through tightening of fasteners, welding cracks, and re-welding any ruptured welds. When in-kind replacement of existing cattle guards that cannot be repaired is required, replacement activities would not extend beyond the existing road prism, would be limited to the superstructure (deck, beams, and bearings), and would not include replacement of the foundation so as to not disturb native soil around cattle guards.
These actions would occur on existing access roads on BPA fee-owned land, as well as access roads where BPA possesses an agreed upon easement with the landowner. Access roads would possess a well-defined and established prism and travel surface that includes a rock base and surface. Wheel tracks through compacted soils are not considered an existing access road. For those particular situations, a new access road construction project and associated environmental review process would be triggered. The proposed maintenance activities would not require or include the construction of new access roads, landings, drainage features or other new ground-disturbing activities beyond those areas previously disturbed in the established road prism. The maintenance activities would be independent from (i.e., not connected to) access road improvements or other activities falling outside of the scope of this CX. No in-water or wetland work is proposed with this activity.

Actions proposed would be reviewed by the BPA NEPA and cultural resources leads to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

**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. (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
2. (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
3. (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/ Chad Browning  
Chad Browning,  
Physical Scientist

Concur:

/s/ Katey Grange  
Date: August 1, 2022  
Katey Grange  
NEPA Compliance Office

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: Routine Maintenance of Bonneville Power Administration Access Roads

Project Site Description

Existing access roads, providing access to BPA electrical transmission infrastructure to include transmission towers, switching platforms, substations, maintenance headquarters, and communication facility support structures. These facilities are located in BPA’s service territory, including Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

   Potential for Significance: No

   Explanation: BPA Historian and Archaeologist reviewed proposed activities and determined that these types of activities do not have the potential to cause effects to historic properties or determined that these types of activities are covered under an existing Section 106 consultation.

   In the event any archaeological material is encountered during project activities, BPA would stop work in the vicinity and immediately notify the BPA environmental lead, archaeologist, and project manager; interested tribes; State Historic Preservation Office (SHPO); and the appropriate local, state, and Federal agencies. BPA would implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering, and take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.

2. Geology and Soils

   Potential for Significance: No

   Explanation: Ground disturbance would be limited to within the existing road surface. Erosion control BMPs would be implemented to prevent soil loss from project areas. Native soil and geology would not be disturbed.

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

   Potential for Significance: No
Explanation: Ground disturbance would be limited to within the existing road surface, landings, and approaches. Assessment of proposed work areas, including on-site if warranted, would be conducted and no Threatened or Endangered, or special-status plant species would be affected by the actions. Only vegetation impeding road route and drainage features would be removed.

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

Potential for Significance: No

Explanation: Ground disturbance would be limited to within the existing road surface and immediately adjacent drainage ditches. Assessment of proposed work areas, including on-site if warranted, would be conducted and no Threatened or Endangered, or special-status wildlife species or habitat would be affected by the actions. Temporary wildlife disturbance from noise would occur during maintenance activities. In those locations containing nesting sensitive Federal or state bird species (e.g. bald and golden eagles), timing restrictions would be employed to minimize nest disturbance.

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

Potential for Significance: No

Explanation: No in-water work would occur. The purpose of the work would be to conduct road maintenance that would prevent erosion and soil loss into waterways. All drainage maintenance would be conducted to restore the flow of water to the original engineered design. Erosion control BMPs would be implemented to prevent sedimentation impacts to nearby waterways.

6. Wetlands

Potential for Significance: No

Explanation: No work would occur within wetlands. The purpose of the work would be to conduct road maintenance that would prevent erosion and soil loss into wetlands. All drainage maintenance would be conducted to restore the flow of water to the original engineered design. Erosion control BMPs would be implemented to prevent sedimentation impacts to nearby wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance would be minimized to light road grading, to include smoothing, reshaping, and filling irregularities, not to impact any native soil beneath imported fill, which would not intersect groundwater.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur.

9. Visual Quality

Potential for Significance: No
**Explaination:** No change in the visual character of the facilities would occur.

10. **Air Quality**

Potential for Significance: No

**Explanation:** Minor, temporary generation of emissions associated with increased vehicle traffic would occur during maintenance activity.

11. **Noise**

Potential for Significance: No

**Explanation:** Minor, intermittent noise associated with installation activities would occur during maintenance activity.

12. **Human Health and Safety**

Potential for Significance: No

**Explanation:** Maintenance activity would improve safety of access roads. Standard fire minimization measures (such as use of spotters, work hours, etc.) would be employed for work as necessary to reduce fire risk.

**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:** If activities are occurring within a non-BPA-owned corridor, BPA would coordinate with the underlying land owner or land manager.

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

Signed: /s/ Chad Browning
Chad Browning
Physical Scientist – EPR-4

Date: August 1, 2022