

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY21 P04462 Brasada-Harney No1 Redmond District Priority Poles Project

**PP&A No.:** 5120

**Project Manager:** Jodie Anderson, TEPL-TPP-1

**Location:** Deschutes, Crook, Harney and Lake Counties, Oregon

**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 replace in-kind wood pole structures and associated structural/electrical components (e.g. cross arms, insulators, guy anchors, etc.) along the Brasada-Harney No1 transmission lines in the Redmond TLM District.

Approximately 235 poles would be replaced. After current pole structures are removed, replacement poles would be placed approximately 5 feet ahead or back on line from the existing structure. Maintenance along existing access road prisms and landings would be performed where necessary to facilitate safe access and several gravel stockpile locations in or next to the right-of-way would be utilized. Access road maintenance includes blading, shaping, rocking, and construction of water bars, drain dips and the replacement of one culvert. Approximately 119 waterbars, 46 drain dips and 60 gates would be installed. Around 46 miles of access road maintenance would occur and around 311 about 50-foot by 50-foot landings would be constructed. A material yard will be utilized to stage materials and would require grading and rocking. This material yard is in Brothers, Oregon, within Deschutes County and is referred to as the Hampton material yard. The Hampton yard is approximately 2.7 acres in size. A summary of the structures to be replaced are below in Table 1.

**Table 1. Structure replacements on the Brasada-Harney No 1 Transmission line**

Structure Work	Township	Range	Section	Land Ownership
8/7	ORT17S	R15E	29	US Bureau of Land Management (BLM)
13/3	ORT18S	R15E	16	BLM
34/1, 35/1	ORT20S	R18E	18, 17	Private
47/7, 47/8, 48/3, 48/4, 49/2, 49/3, 49/4, 49/5, 50/7, 52/2, 52/5, 53/1, 53/2, 53/3, 53/4, 53/5, 53/6, 53/7	ORT21S	R20E	18, 20, 21, 27, 26, 35, 36	Private, State
54/3, 54/4, 54/6, 54/7, 56/1, 56/2, 56/4, 56/5, 56/6, 56/8, 57/1, 57/2, 57/4, 57/6, 60/7, 62/1, 63/2, 63/4, 64/1, 64/6, 65/1, 65/4, 65/5, 65/6, 66/3, 66/4, 66/7, 67/1, 67/4, 67/8, 68/1, 68/3, 68/4, 68/5, 68/6, 69/1, 69/3, 69/5, 69/6, 69/7, 69/8, 70/1, 70/2, 70/3	ORT22S	R21E, R22E, R23E	6, 5, 9, 18, 17, 21, 22, 26, 25, 30, 31, 32, 33	Private, BLM
70/4, 70/5, 70/7, 71/1, 71/2, 71/3, 71/4, 71/5, 71/6, 71/7, 72/1, 72/2, 72/3, 72/4, 72/5, 72/6, 72/7, 73/1, 73/4, 73/6, 73/7, 74/1, 74/3, 74/6, 74/7, 74/8, 74/9, 75/1, 75/2, 75/3, 75/4, 75/5, 75/6, 75/7, 76/1, 76/3, 76/4, 76/5, 76/6, 76/8, 77/1, 77/2, 77/3, 77/4, 77/5, 77/6, 78/2, 78/3, 78/4, 78/7, 78/8, 79/1, 79/7, 80/2, 80/5, 80/6, 80/7, 81/4, 81/6, 81/7, 81/8, 82/1, 82/2, 82/3, 83/2, 84/2, 84/4, 84/7, 85/1, 85/3, 85/5, 85/6, 85/7, 86/1, 86/2, 86/4, 86/5, 86/7, 87/2, , 90/5, 90/6, 90/7, 91/1, 91/2, 91/3, 91/4, 91/5, 91/6, 91/8, 92/1, 92/2, 92/3, 92/4, 92/6, 92/7, 96/1, 96/2, 96/3, 96/4, 96/5, 96/6, 96/7, 97/1, 97/2, 97/3, 97/5, 97/6, 97/7, 98/1, 98/2, 98/3, 98/4, 98/5, 98/6, 98/7, 98/8, 99/1, 99/4, 99/6, 99/7, 100/1, 100/2, 100/3, 100/4, 100/5, 100/6, 100/7, 100/8, 102/2, 102/3, 103/1, 105/5, 105/7, 105/8, 106/3, 106/4, 106/5	ORT23S	R23E, R24E, R25E, R26E, R27E, R28E, R29E	4, 3, 2, 11, 12, 7, 8, 14, 17, 16, 15, 21, 22, 23, 24, 25, 30, 20, 21, 19, 14, 13, 29	BLM, Private, State

The proposed project would help to maintain reliable power in the region. 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 1021.410(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.<sup>1</sup>

/s/ Zoe Wellschlager  
Zoe Wellschlager  
Physical Scientist (Environmental)

Concur:

/s/ Katey C. Grange  
Katey C. Grange  
NEPA Compliance Officer

Date: May 9, 2025

Attachment(s): Effect Determination

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<sup>1</sup> 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 CX 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.*

# **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:** FY21 P04462 Brasada-Harney No1 Redmond District Priority Poles Project

## **Project Site Description**

The project is located in Central Oregon within the Blue Mountains and Northern Basin and Range ecoregion as well as the following sub ecoregions: John Day/Clarno Uplands, Continental Zone Foothills, Deschutes River Valley, Pluvial Lake Basins, High Desert Wetlands, and the High Lava Plains. The project area ranges from sagebrush steppe to monocultures of juniper, to exposed volcanic rock and playas. Much of the project area lies in the Prineville and Burns Bureau of Land Management (BLM) districts. Smaller sections of the line go through private agricultural land and land managed by the State of Oregon for grazing.

The transmission line corridor ranges from 40 feet to 450 feet in width in the project area. Soils are generally rich in clay, silt and sand. Outcrops of rock as well as rocky patches are common features of the landscape. Vegetation within the right-of-way is periodically managed to remove tall growing vegetation and promote low-growing species, though much of the project area has low growing vegetation naturally. Sagebrush, juniper, rabbitbrush and various bunch grasses species sparsely cover the project area. Several intermittent waterways and small wetlands are present near or in the project area.

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

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

Potential for Significance: No

Explanation: On July 31<sup>st</sup>, 2025, BPA initiated consultation with the Burns Paiute Tribe, the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), the Prineville Bureau of Land Management (BLM), the Burns BLM, and the Oregon State Historic Preservation Office (SHPO). Oregon SHPO provided concurrence with the Area of Potential Effect (APE) via a letter dated October 23<sup>rd</sup>, 2024. For those eligible and unevaluated sites identified during field surveys, BPA would implement various avoidance measures (avoidance, flagging, monitoring, geotextile fabric etc.).

BPA has determined this project qualifies as an emergency situation and is following the process described at 36 CFR § 800.12(b)(2) of the National Historic Preservation Act (NHPA). BPA's determination is consistent with Executive Order 14156 "Declaring a National Energy Emergency." BPA sent the final emergency notification on April 28<sup>th</sup>, 2025 to the Oregon SHPO, the Advisory Council on Historic Preservation (ACHP), the Burns Paiute, and the CTWSRO. The emergency notification detailed various minimization efforts BPA was implementing. BPA received comments noting the acceptability of BPA's proposed implementation measures as well as responses from the ACHP (May 6<sup>th</sup>, 2025), the Oregon SHPO (May 7<sup>th</sup>, 2025), the CTWSRO (May 6<sup>th</sup>, 2025), and the Burns Paiute (May 7<sup>th</sup>, 2025). The Oregon Department of State Lands was made aware of 6 structures on their lands that would be replaced and agreement was received verbally on May 7<sup>th</sup>, 2025. Through avoidance measures identified near the eligible and unevaluated sites, the project would result in a no to low effect to cultural resources.

Notes:

In the event any archaeological material is encountered during project activities, work would be stopped, and the BPA environmental lead, archaeologist, and project manager would be immediately notified. Reasonable measures would be taken to protect the discovery site, including any appropriate stabilization or covering.

## **2. Geology and Soils**

Potential for Significance: No

Explanation: All wood pole replacements would be in-kind and be placed near the locations of the existing poles. Localized soil disturbance would occur during wood pole replacements, landing improvements, access road maintenance activities and during material yard setup. Standard construction erosion control measures would be utilized as necessary.

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

Potential for Significance: No

Explanation: No Federal special-status, state listed, or BLM sensitive plants are present. However, if any federal or state listed plant species are unknowingly in the project area, project activities would be limited to the already impacted right-of-way and would not substantially alter existing plant communities. No concerns about sensitive plant species were expressed by public land managers.

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

Potential for Significance: No

Explanation: Construction on the project would likely disturb wildlife in the area due to the presence of humans and additional noise. However, disturbance would be temporary and limited to the already impacted right-of-way and access roads and would not substantially alter the long-term footprint or operational noise of the line; therefore, wildlife and associated habitat would not be affected in the long term.

Notes:

- In the event an active eagle nest is discovered, maintain 660 feet from nest and conduct work outside of eagle breeding season between October 1<sup>st</sup> and December 15<sup>th</sup>. Notify BPA Environmental lead.
- Bird diverters would be added on the cross arms of the Brasada-Harney No 1 transmission line. These bird diverters would prevent birds from landing, which would reduce momentary outages for structures.

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

Potential for Significance: No

Explanation: No in-water work is planned in or near ESA-listed fish streams. A culvert would be installed on an un-named ephemeral stream that is non-fish bearing. The work would qualify under the non-notifying nationwide permit 57 for section 404 of the CWA as less than 1/10<sup>th</sup> of an acre would be affected by the ford construction within the Portland USACE district. The culvert work would take place during the dry season, however, if flow is present during the work window, the work area would be isolated prior to construction, with a coffer dam, and flow would be maintained. In addition, all stormwater will be infiltrated on-site and work will take place during the dry season. The work location is located in arid eastern Oregon. Standard construction erosion control measures would be utilized to ensure sediment and other contaminants do not enter bodies of water; therefore, water bodies, floodplains, and fish would not be affected by the proposed project activities.

## **6. Wetlands**

Potential for Significance: No

Explanation: No in-water work is planned in or near wetlands. Several different types of wetlands exist in or near the project area where roadwork improvement would occur; however, the work planned would be on existing roadways and should not create an additional impact to the wetlands present. Furthermore, work is planned for summer when water table levels would be lower and there is less risk of disturbing wetlands. Standard construction erosion control measures would be utilized to ensure sediment and other contaminants do not enter bodies of water; therefore, water bodies, floodplains, and fish would not be affected by the proposed project activities.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Project activities are not expected to impact groundwater or aquifers. The maximum depth of disturbance would be about 12 feet below ground surface.

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

Potential for Significance: No

Explanation: Land use in the area consists of transportation, recreation, agricultural, ranching and transmission easement. Roads near the project area could still be utilized by recreationists and there are many alternative recreational areas nearby for the public to utilize during the project work period. The project would not result in permanent changes or impacts to land use. The material yard for pole storage would be developed to manage treated wood poles. Appropriate BMPs would be utilized to contain the treated wood poles.

## **9. Visual Quality**

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of wood poles and associated components would be in kind and in the same location. The project would be consistent with the existing visual quality of the area.

## **10. Air Quality**

Potential for Significance: No

Explanation: Exhaust and dust from utility and construction equipment may temporarily reduce air quality in the immediate project area. A fugitive dust plan would be implemented to control dust generation, if needed. With an appropriate dust control mitigation plan, the project would have minor, temporary impacts to air quality.

## **11. Noise**

Potential for Significance: No

Explanation: Construction noise would be temporary and would occur during daylight hours. Operational noise of the transmission line would not change. The project area is also relatively remote and located away from recreational sites and concentrated human activity.

## **12. Human Health and Safety**

Potential for Significance: No

Explanation: BPA personnel would develop a site-specific health and safety plan to address any hazards during the proposed work. The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line and to maintain power delivery in the region.

### **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 would notify and coordinate with the landowners/managers in advance of the construction of the proposed project. The BPA realty specialist has been in contact with multiple BLM offices as well as the Oregon Department of State Lands (ODSL). The BLM and ODSL were given advance notice of the project.

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

Signed: /s/ Zoe Wellschlager

Zoe Wellschlager

Physical Scientist (Environmental)

Date: 5/9/2024