

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Marker Ball Replacements - Phase 6

PP&A No.: 6587

Project Manager: Jodie Anderson - TEPL-TPP-1

Location: Clackamas County, Oregon; Kittitas County, Washington.

Categorical Exclusion Applied (10 C.F.R. Part 1021): B1.3 Routine Maintenance; B1.9 Airway Safety Markings and Painting; B3.2 Aviation Activities.

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to remove, replace, or retire approximately 14 marker balls on the Schultz-Raver No.1/Schultz-Echo Lake No.1 transmission line from structure 42/3 to 42/4 and the John Day-Marion No.1 transmission line from structure 83/4 to 84/1. These transmission line spans are in Clackamas County, Oregon; and Kittitas County, Washington.

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. Existing marker balls are yellow, orange, or white in color, and would be 24 to 36 inches in diameter. New marker balls would be the same colors, but all would be 36 inches in diameter, constructed of metal, and have an improved clamping system to better secure them to transmission lines. Construction is proposed for Fall 2025.

All marker ball activities would utilize Human External Cargo (HEC) - a two-person crew suspended from a helicopter. Two helicopter landing zones are necessary for helicopters to land and take off, refuel, and stage crew and equipment. Flatbed trucks, trailers, or similar vehicles would be used to haul materials and equipment. Grading, vegetation removal, or other potentially ground-disturbing work would not be performed at helicopter landing zones or associated access roads.

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 *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), 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.¹

/s/ Oden W. Jahn

Oden W. Jahn

Physical Scientist (Environmental)

Concur:

/s/ Katey C. Grange

Katey C. Grange

NEPA Compliance Officer

Date: September 5, 2025

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), 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: Marker Ball Replacements - Phase 6

Project Site Description

The proposed action is located in Clackamas County, Oregon; and Kittitas County, Washington. The proposed action would occur within, and adjacent to, BPA's right-of-way (ROW) and access roads of select spans of several high voltage transmission lines listed in Table 1, below. Two marker ball spans occur on lands managed by the United States Forest Service (USFS): Schultz-Raver 42/3-42/4 (Okanogan-Wenatchee National Forest) and John Day-Marion 83/4-84/1 (Mt. Hood National Forest).

Vegetation in the ROW is managed to prevent tall-growing vegetation from encroaching in the energized zone which can cause transmission line outages or fires. In many parts of the action area, the vegetation regime resembles an early seral state; however, in deep canyons, the maximum height of mature vegetation, such as conifers, will not interfere with the operation of the transmission line. In these areas, vegetation is not managed, or only the tallest vegetation is managed. Elevations of the structures in the action area range from 2,517 feet to 3,180 feet above sea level.

Table 1- Marker Ball Spans

Operating Name	Span	Span Length (ft)	County	State	MB Qty (span)
John Day-Marion No.1	83/4-84/1	3930	Clackamas	OR	6
Schultz-Raver No.1 Schultz-Echo Lake No.1	42/3-42/4	1150	Kittitas	WA	8

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: On December 23rd, 2024, BPA initiated Section 106 consultation for the Area of Potential Effect (APE) for marker ball placement on the John Day-Marion No. 1 line. No archaeological resources were identified during field surveys. One eligible transmission line was identified within the APE; however, it would not be impacted. BPA sent copies of survey report and BPA's determination of No Adverse Effect to Historic Properties to the consulting parties on July 30th, 2025: the Confederated Tribes of Siletz Indians, the Confederated Tribes of Grand Ronde, the Confederated Tribes of the Warm Springs

Reservation of Oregon (CTWSRO), and the Oregon State Historic Preservation Office (SHPO). Concurrence was received from SHPO on August 26th, 2025, the CTWSRO on August 29th, 2025, and the Confederated Tribes of Grand Ronde on August 29th, 2025. No other responses were received within 30 days.

On December 23rd, 2024, BPA also initiated Section 106 consultation for the APE for marker ball placement on Schultz-Raver No.1/Schultz-Echo Lake No.1 lines. No archaeological or historic resources were identified within the APE. BPA sent copies of survey reports and BPA's determination of No Adverse Effect to Historic Properties to the consulting parties on July 30th, 2025: the Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Indian Tribe, the Snoqualmie Indian Tribe, and the Washington Department of Archaeology and Historic Preservation (DAHP). Concurrence was received from DAHP on July 30th, 2025. No other responses were received within 30 days.

2. Geology and Soils

Potential for Significance: No

Explanation: Project activities are not expected to result in soil disturbances.

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

Potential for Significance: No

Explanation: There are no Federal/state special-status plant species or habitats known to occur in the project area. Vegetation may be crushed in landing zones or where equipment would be staged for marker ball replacements, but this is a temporary impact. There would be no effect to ESA-listed plant species, and no impacts to state or other sensitive species are anticipated.

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

Potential for Significance: No with Conditions

Explanation: Gray wolf, North American wolverine, marbled murrelet, northern spotted owl, and monarch butterfly are potentially present in the project area. Project activities may temporarily disturb individual gray wolf, North American wolverine, marbled murrelet, or northern spotted owl, if present in the project area at the time of these activities. Monarch butterfly is not expected to be in the project area at the time of project activities. Therefore, BPA determined that the proposed project may affect, but is not likely to adversely affect gray wolf, North American wolverine, marbled murrelet, northern spotted owl, and monarch butterfly. The US Fish and Wildlife Service concurred with these determinations in a letter dated June 16, 2025. Additionally, non-sensitive bird species may utilize the trees adjacent to the ROW corridor for nesting and rearing, however, the project would occur after the breeding season

Notes: The following conservation measures would be implemented during this project:

- Helicopters would transit from the municipal airport to the work area at an elevation greater than 500 meters (1640 feet) Above Ground Level (AGL).
- Northern Spotted Owl: Except where noted in the species discussion below, hovering helicopter work within 50 yards from modeled suitable NSO habitat would take place outside of the breeding season (March 1 to September 30), and work areas between 50 and 110 yards from suitable habitat would take place outside of the critical breeding season (March 1 to July 15).
- Marbled Murrelet: Helicopter activities within the disruption distance from assumed-occupied suitable habitat, would take place outside of the breeding season from April 1 to September 15 (OR)/September 23 (WA), or within the breeding season with daily

dawn/dusk timing restrictions (start work at least two hours after sunrise and end work at least two hours before sunset. Sunrise/sunset times are to be based on U.S. Naval Observatory data).

- Overnight camping would not take place during project activities.
- Work hours would be during daylight hours, approximately between 9am and 5pm.
- To minimize the risk of attracting predators to activity areas, all garbage (especially food products) must be contained or removed daily from the vicinity of any activity that occurs within the action area.

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 spans several canyons containing major waterbodies, such as the Clackamas River. Some of the waterbodies are habitat for ESA-listed anadromous fish. Project activities are not expected to impair the physical or biological functions of fish-bearing or non-fish-bearing water bodies or floodplains in the project area. Landing zones would be located far enough away from waterbodies so no contamination would likely occur.

Notes: The following conservation measures would be implemented during this project:

- Helicopter landing zones would be the only areas where fueling would occur in the project area. Standard BMPs would be implemented during fueling operations and include:
 - Fueling would not occur within 150 feet of a water resource or conveyance (e.g., a lake, pond, river, stream, wetland, canal, ditch, etc.).
 - When possible, fueling would occur on a flat and impermeable surface.
 - Spill management and fire suppression equipment would be immediately available.
 - Fueling would only be conducted by trained and qualified personnel in accordance with governing laws, regulations, policies, and procedures.
 - Workers performing fueling would receive training in proper fueling operations and spill response.
 - Fueling equipment would have a kill switch that can immediately stop the fueling operation.
 - The flow rate of fueling equipment would not exceed 10 gallons per minute.
 - While fueling, the operator would cup an absorbent pad under the nozzle and wait 30 seconds after fueling has stopped to allow all fuel to leave the nozzle. When returning from the helicopter to the fueling truck, the operator would hold the cupped nozzle upwards.
 - Should any fuel be spilled, the soil would be excavated and placed in a plastic bag or container for proper handling and disposal.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: No wetlands have been identified in the project area; however, wetlands may be found adjacent to the waterbodies listed above. Project activities would not result in soil disturbances within wetlands; however, refueling activities have the potential to contaminate wetlands that may be adjacent to landing zones, though that risk would be minimized through the implementation of BMPs.

Notes: The measures described under #5 above would minimize the potential for the proposed project to impact wetlands.

7. Groundwater and Aquifer

Potential for Significance: No with Conditions

Explanation: Refueling activities have the potential to impact groundwater or aquifers via spill contamination. BMPs identified are expected to reduce the risk of potential groundwater contamination.

Notes: The measures described in #5 above would minimize the potential for the proposed project to impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur and project activities would not impact existing land uses; however, there may be temporary noise disruptions to recreational users where project activities would take place on public lands. This disturbance would be expected to be short term, typically lasting less than one day per span.

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. The addition of marker balls where none existed may make the transmission lines more visible to the public; however, the intent of the marker balls is to make the transmission lines more visible to aircraft.

10. Air Quality

Potential for Significance: No

Explanation: The proposed project would utilize conventional equipment and helicopters powered by petroleum fuels. Exhaust would temporarily impact air quality in the immediate vicinity while the equipment is in operation. Additionally, dust may be created by helicopter operations. Dust creation would be isolated to small areas and in short duration. Water would be used for dust suppression. Baseline air quality conditions are expected to return shortly after project activities cease.

11. Noise

Potential for Significance: No

Explanation: Project would have noise associated with use of a small helicopter. During project activities, work would take place during daylight hours, for approximately eight hours per day. The project would be relatively short in duration – no more than two days at a single transmission line span. The operational noise of the transmission line would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA's contractor would develop a site-specific health and safety plan to address any hazards that may be encountered during the proposed work, including potential exposure to dust and the use of human external cargo.

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 notified the United States Forest Service Okanogan-Wenatchee National Forest on September 12, 2024, and notified the Mt. Hood National Forest on February 4, 2025.

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

Signed: /s/ Oden Jahn

Oden W. Jahn

Physical Scientist (Environmental)

Date: September 5, 2025