Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Buckley-Marion No. 1 Urgent Overhead Ground Wire and Marker Ball Replacement

PP&A No.: 6003

Project Manager: Jodie Anderson - TEPL-TPP-1

Location: Wasco County, Oregon

Categorical Exclusion Applied (from 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 replace the overhead ground wire (OHGW) from structure 11/2 to 12/1 (one span) on the Buckley-Marion No. 1 / Ashe-Marion No.1 double-circuit 500-kilovolt transmission line that was damaged by lightning. The project would replace the six marker balls that were lost in the lightning incident and install an additional 11 marker balls to meet Federal Aviation Administration requirements for airway safety markings.

The replacement OHGW would be sized slightly larger to accommodate the additional marker balls for this span. The marker balls would be yellow, orange, or white in color, 36 inches in diameter and constructed of metal. Marker balls would be approximately the same size and color as prior to the lightning damage.

Approximately four miles of road access work would be performed, including the addition of approximately 7,900 tons of aggregate, to allow construction equipment ingress and egress. Seven permanent equipment landings, totaling approximately one-third of an acre, would be constructed at the two structure sites to provide a stable base for the utility line equipment. One temporary helicopter landing zone would also be established adjacent to the right-of-way (ROW) near 12/1.

Work would be accomplished using utility line equipment specialized for tall towers, including a helicopter, cranes, and bucket trucks. Pulling and tensioning equipment would be utilized at each pulling and tensioning site to achieve the proper tension on the OHGW. Marker balls would be fastened to the OHGW one at a time, as the new OHGW is being pulled across the span. Flatbed trucks, trailers, or similar vehicles would be used to haul materials and equipment to support OHGW and marker ball replacement activities. Dump trucks, graders, dozers, excavators, and other earth-moving equipment would be used to support access road work activities.

Construction is proposed for a period of approximately two weeks in November 2025.

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 Jahn*
Oden W. Jahn
Physical Scientist (Environmental)

Concur:

/s/ *Katey Grange*
Katey C. Grange
NEPA Compliance Officer Date: *November 4, 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: Buckley-Marion No. 1 Urgent Overhead Ground Wire and Marker Ball Replacement Project

Project Site Description

The proposed action is located near Maupin, in Wasco County, Oregon, and would occur within, and adjacent to, BPA's right-of-way (ROW) and access roads of the double-circuit, 500-kilovolt Buckley-Marion No. 1 / Ashe-Marion No.1 transmission line between structure 11/2 and 12/1. The transmission line span is approximately 3,672 feet long. The majority of the project area occurs on private lands; however, structure 11/2, several hundred feet of access road work and two permanent equipment landings are located on lands managed by the Bureau of Land Management (BLM) – Prineville District. The project's transmission line span is above the river access road and Oasis river-side campground administered by the BLM. The span crosses the Deschutes River, a designated Wild and Scenic River.

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. All project activities would occur in high desert uplands where the vegetation regime is dominated by juniper, sage brush, and grasses. The elevation of structure 11/2 is 1,240 feet above sea level, and structure 12/1 is 1,630 feet above sea level.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA is proposing this project consistent with the emergency procedure described at 36 CFR § 800.12(b)(2) of the National Historic Preservation Act (NHPA) and the emergency declared by the President in Executive Order 14156 "Declaring a National Energy Emergency." BPA sent an emergency notification packet to the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), the Bureau of Land Management – Prineville District Deschutes Field Office (BLM), the Oregon State Historic Preservation Office (SHPO), and the Advisory Council of Historic Preservation (ACHP) on October 28th, 2025 detailing the project as well as BPA's recommendation to minimize impacts to a site by laying down geotextile fabric, avoid a site by flagging for avoidance, and that road work could proceed in one site due to a presumed lack of eligibility. The BLM responded on October 28th, 2025, with no further comments. The Oregon SHPO and the ACHP responded on November 3rd, 2025; neither had any project implementation comments. BPA did not receive comment from the CTWSRO. The project may proceed as planned with the avoidance and minimization methods below.

Notes:

- Geotextile fabric would be placed over approximately 460 feet of existing access road prior to the addition of aggregate where the road bisects the known archaeological site.
- Another archaeological site will be delineated with exclusionary fencing during construction to prevent unauthorized entry.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Access road construction activities are expected to cause temporary soil disturbances that increase the chance of project-related erosion. Roads and landings would be surfaced with imported aggregate, minimizing exposed soils. Site restoration of areas not surfaced with aggregate would begin during, and immediately after, construction activities and would incorporate the conservation measures discussed below. Additional BMPs would be implemented as necessary. Therefore, the proposed action would have limited temporary impacts to geology and soils.

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

- Soils would be prepared for revegetation by contouring, if necessary, to blend with existing topography, and by surface-roughening by tracking and/or contour furrows as described in BMP C130E in the Eastern Washington Stormwater Manual.
- Vegetative cover/stabilization would be re-established by seeding and mulching as described in BMP C120E: Temporary and Permanent Seeding; and C121E: Mulching. An appropriate seed mix would be chosen from BMP C120E and applied at the recommended rate, unless otherwise specified by landowner.
- Bonded fiber matrix (as discussed in BMP C120E) or rolled erosion control products (as discussed in BMP C122E: Nets and Blankets) would be utilized for slopes greater than 2.5H:1V (40 percent).
- Staging, fueling, materials storage sites would be at least 150 feet from any natural water body or wetland. All equipment fueling operations would utilize pumps, funnels, and absorbent pads. Engine, transmission, and hydraulic oil may be added as needed utilizing funnels and drip pans.
- If a fluid leak is discovered on a piece of construction equipment, drip pans and/or absorbent pads would be placed under the leak to prevent fluid contact with ground or soil surface. The piece of equipment would be removed from the project site within 24 hours and repairs performed prior to returning the equipment to the project.
- Spill containment and cleanup materials would be readily available in construction equipment, staging areas, and at work sites. Any spill response materials used would be replaced within 24 hours.
- Secondary containment would be utilized where generators, pumps, or other small stationary machinery (i.e., less than 5-gallon fuel tank) are needed within 150 feet of waterways.

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

Potential for Significance: No with Conditions

Explanation: Vegetation within the footprint of roads, landings and pulling and tensioning sites would be removed and replaced with aggregate surfaces. Vegetation would be mowed to facilitate the helicopter landing zone and other project activities but is expected to return to previous levels. There are no Federally-listed plants or habitats known to occur in the project area; however, Sessile mousetail (Myosurus sessilis) and Tygh Valley milk-vetch (Astragalus tyghensis) are two state special-status plant species that have been documented in the project area. Sessile mousetail is ranked critically imperiled in Oregon and is a candidate for state listing. Tygh Valley milk-vetch is ranked as imperiled in Oregon and is state-listed as threatened. A pre-construction survey would be conducted to identify sensitive plants in the project area, and if found, populations would be flagged for avoidance. It is possible that sensitive plants would be found within the road footprint and impacts would be unavoidable; however, the number of individuals impacted is expected to be minimal, and losses would not significantly affect the overall abundance of these plants.

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

- Machines, vehicles, and other equipment would be cleaned prior to working within the project area.
- Weeds or other unwanted vegetation would not be spread.
- Vehicles and equipment would stay within authorized work areas.
- Soil disturbance beyond the footprint of authorized roads, landings, and pulling and tensioning sites would be minimized.

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

Potential for Significance: No

Explanation: Golden eagles may be present within the general project area, but no nest sites are recorded within a mile of the project area. The project would take place outside of the general nesting season for birds that are expected to be present within the project area. Further, the airway marker balls are expected to minimize the potential for bird collisions with the transmission line in this span.

There are no other Federal/state special-status species and habitats known to occur in the project area; therefore, the proposed action would not affect Federal/state special-status wildlife. Non-sensitive wildlife that may utilize the project area could be affected by construction noise, use of equipment, and human activity; however, these impacts would be temporary, would only occur during daylight hours, and habitat would not be modified in a way that would preclude the future use of the project area.

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

Potential for Significance: No with Conditions

Explanation: Project activities are located in upland areas away from waterbodies, floodplains, listed fish species, or their habitat, and are not expected to impact these types of resources.

Notes: The BMPs described above would minimize the potential for the proposed project to impact waterbodies, floodplains, listed fish species, or their habitat.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: Project activities are located in upland areas and are not expected to impact wetlands.

Notes: The BMPs described above would minimize the potential for the proposed project to impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: Project activities are not expected to impact groundwater or aquifers.

Notes: The BMPs described 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: The span between 11/2 and 12/1 crosses the Deschutes River, a designated Wild and Scenic River. No work would take place along the river, and the project is not considered a water resource project and not subject to review under Section 7 of the Wild and Scenic Rivers Act (WSRA). Additionally, BPA possesses the appropriate rights to operate and maintain this transmission line crossing and the project is within BPA's existing rights. The transmission line and associated infrastructure is an existing use within the designated Wild and Scenic River area and would not conflict with river protection under the WSRA.

The Lower Deschutes River exhibits the following outstandingly remarkable values, as defined in the Wild and Scenic Rivers Act: Botany, Fish, Geology, History, Prehistory, Recreation, Scenery, and Wildlife. The proposed project does not have the potential to affect Botany, Fish, Geology, History, Prehistory, and Wildlife in the river corridor.

The proposed project would temporarily affect recreation within the river corridor. The project's transmission line span is above the river access road and Oasis river-side campground administered by the BLM. For safety reasons, recreationists and campground users would be temporarily displaced or disrupted during pulling and tensioning activities which are expected to occur over the course of two or three days. The pulling and tensioning activities would occur outside of peak summer recreation and only during daylight hours where campground use is expected to be lower.

The proposed project would potentially affect scenery value by increasing the number of marker balls on the span from six to 17; however, when viewed from vantage points along the river, over 400 feet below, the marker balls do not have considerable visual weight or dominance. Project construction activities using cranes and helicopters and occurring on the plateau above the river are expected to be at least partially visible from the river corridor, but these activities would be temporary and are expected to last less than a week. The proposed project, once completed, would be consistent with baseline conditions, and would not appreciably diminish the scenery or visual character of the area.

9. Visual Quality

Potential for Significance: No

Explanation: As discussed above, the proposed project would have discountable permanent impacts to visual quality from key viewing areas; however, the appearance of the transmission line and the ROW would be consistent with baseline conditions, and the purpose of the marker balls is to enhance transmission line visibility by aircraft and birds. Construction activities would be temporarily visible from hey viewing areas and may temporarily generate dust if conditions are dry at the time of construction.

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 if needed. Baseline air quality conditions are expected to return shortly after project activities cease.

11. Noise

Potential for Significance: No

Explanation: Project would produce noise associated with the use of construction equipment and 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 –

expected to last approximately two weeks. The baseline operational noise of the transmission line would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA construction crews would develop a site-specific health and safety plan to address any hazards that may be encountered during the proposed work. A safety watcher and/or traffic flagger would be present along the Lower Deschutes Road and Oasis Campground to minimize potential for recreationists to be exposed to construction hazards associated with pulling and tensioning the OHGW.

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 would notify all landowners and managers to the extent possible given the urgent nature of the proposed project.

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* Date: *November 4, 2025*
Oden W. Jahn
Physical Scientist (Environmental)