

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Morrow Solar Generation Interconnection Project (*update to previous CX issued April 23, 2025*)

Project No.: P02302; G0513, G0532, and LURR20260015

Project Manager: Jay Chester, TEPS-TPP-1

Location: Morrow County, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.11 Electric power substations and interconnection facilities; B4.13 Upgrading and rebuilding existing powerlines; B1.7 Electronic Equipment

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to install electronic equipment and fiber optic cable at Boardman and Morrow Flat substations, rebuild a portion of BPA's 115kV Boardman-Alkali No. 1 (BOAD-ALKA-1) transmission line, reconstruct access roads, and construct a new tap transmission line to facilitate Avangrid Renewables LLC's solar generation interconnection requests (G0513 and G0532). BPA would also install electronic equipment inside Avangrid's Morrow solar facility's control house once it is constructed by the customer. These BPA actions would support the interconnection of Avangrid's Morrow solar generation facility (previously called Tower Solar and Aurora Solar; Morrow County Land Use Decision N-37-21) into BPA's high-voltage Federal Columbia River Transmission System. This CX has been updated to include additional fiber optic cable work on BPA fee-owned property.

BPA would install new racks, metering equipment, communications equipment, and relay protection equipment inside the control houses at Boardman and Morrow Flat substations. New current and voltage transformers, surge arresters, and grounding wires would be installed within the Boardman Substation yard. New gravel would also be added to the substation yard to level the grade. South of the Boardman Substation, BPA contractors would install a new customer vault to facilitate the fiber optic cable connections, and Windwave Communications would install new 2-inch-diameter conduit in a trench, and install new fiber optic cable by splicing it into existing cables. The new and existing conduit would connect the new and existing customer and BPA vaults to the BPA control house at the substation.

BPA would rebuild about 2,500 linear feet of the BOAD-ALKA-1 transmission line, located immediately west of, and south of, the Boardman Substation. BPA would acquire a new 4-acre easement to accommodate the rebuild, and would install two new single wood pole structures, one 2-pole wood H-frame structure, and five 3-pole wood H-frame structures with guy anchors up to 150 feet west of the existing BOAD-ALKA-1 transmission line. Following installation, the existing five single wood pole structures and two 2-pole wood H-frame structures (structures 1/1 to 1/8) would be removed from the ground.

To accommodate the new tap line's connection to BPA's BOAD-ALKA-1 transmission line, BPA would replace structure 9/5 with a new steel-lattice structure, install two 40-foot-tall 2-pole wood H-frame structures, install two 30-foot-tall lattice tower switch structures, and install a new steel-

lattice structure. Then, BPA would construct a 600-foot-long tap transmission line between the BOAD-ALKA-1 line and the Morrow solar facility, including two 3-pole wood structures with guy anchors.

A new unpaved access road about 1,400 feet long, spur roads, and structure landings, would be constructed near the rebuilt portion of the BOAD-ALKA-1 transmission line. About 1 mile of existing, dirt two-track access road located between Tower Road and the tap transmission line would also be reconstructed. Access road work would include grading, blading, mowing shrubs and other herbaceous vegetation that have grown into the road prism and along the roadsides, and installation of base rock and surface gravel.

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)). Also, BPA authorizes the use of and manages its fee-owned lands pursuant to its authority under sections 2(e) and 2(f) of the Bonneville Project Act. 16 U.S.C. § 832a(e)-(f).

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; 89 FR 34074, April 30, 2024), 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.¹

Becky Hill
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

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: Morrow Solar Generation Interconnection Project (P02302; G0513, G0532, and LURR20260015)

Project Site Description

The project site is located near Boardman, Oregon, and includes the BPA Boardman Substation located in eastern Boardman, the BPA Morrow Flat Substation located about 1 mile east of the Boardman Substation, and a portion of the BOAD-ALKA-1 transmission line located about 4.5 miles west of Boardman near the Boardman Airport. Interstate 84 passes through the town of Boardman, and the area is comprised of large warehouses, vegetable and cheese processing centers, data centers, a water treatment plant, irrigated circle crops, degraded rangeland with sparse vegetation cover due to cattle grazing, transmission line rights-of-way corridors, and an airport. The Columbia River is about 1 mile north of the nearest project site. There are no wetlands, waters, or floodplains within the project areas.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: BPA initiated Section 106 consultation on May 28, 2024, in advance of a geotechnical study to inform the design of the transmission line upgrades. The consulting parties included: the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Tribes of the Warm Springs Reservation of Oregon, the Nez Perce Tribe, the Confederated Tribes and Bands of the Yakama Nation, and the Oregon State Historic Preservation Office (SHPO). An archaeologist monitored onsite geotechnical investigations in July 2024, and no cultural resources were identified.

On October 17, 2024, BPA reinitiated Section 106 consultation for the interconnection project, with the previously mentioned consulting parties. On the same day, SHPO confirmed receipt of the initiation letter and Area of Potential Effect. The Nez Perce Tribe responded in an email on October 21, 2024, stating they would defer to the CTUIR for this Project. Subsequent surveys identified two archaeological sites. Engineering design plans were modified to avoid project work within a 100-foot buffer of the sites.

On February 19, 2025, BPA distributed a no adverse effect to historic properties determination report to the previously mentioned five consulting parties. The determination report was also sent to the Port of Morrow, which was erroneously excluded from the initiation distribution list, and has since been added to the list of consulting parties.

The BPA historian determined that the Boardman-Alkali No. 1 Transmission is eligible for listing in the National Register of Historic Places. However, BPA finds that the proposed undertaking will not adversely affect the eligible transmission line.

BPA determined that implementation of the proposed undertaking would result in no adverse effect to historic properties pursuant to Section 106 of the National Historic Preservation Act.

No comments on the determination report were received from consulting parties and Section 106 consultation closed on March 20, 2025.

On November 17, 2025, the BPA archaeologist determined that the additional fiber optic cable and vault work was covered under the previous Section 106 consultation, and no further action was necessary.

Notes:

- The documented archaeological sites plus a buffered distance would be flagged and avoided during construction.
- A cultural resources monitor would be present during a kickoff meeting with the contractors to educate them about the presence of the archaeological site(s).
- BPA's environmental compliance staff for implementation (EP) would ensure the fencing/flagging stays in place and the sensitive areas are avoided.
- BPA's Post-Review Discovery Plan will be provided to the construction contractors. In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

2. Geology and Soils

Potential for Significance: No

Explanation: Soils in the project area consist of Quincy Loamy Fine Sand that range from 2 to 12 percent slope and are moderately deep to very deep and excessively drained mixed sands. Soil disturbances would occur where access road work is proposed, new transmission structures would be installed, and retired structures would be removed or replaced. The landscape is flat with little risk of erosion and work areas are not near resources that would be adversely affected by sediments. Best management practices (BMPs) would be implemented, including reseeding disturbed areas to reduce the likelihood of soil migrating offsite during the frequent high-wind events in the Boardman area. Therefore, impacts to geology and soils are expected to be low.

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

Potential for Significance: No

Explanation: No federally-listed or special-status plant species or habitats exist within the project area. Historic populations of white sand verbena (*Abronia mellifera*; ORBIC List 3) and Henderson Robinson's onion (*Allium robinsonii*; ORBIC List 2-ex) have been documented over 2 miles away from the nearest project site, but were not detected within the project area during field investigations.

Up to 4 acres of degraded rangeland with sparse vegetation cover would be temporarily disturbed during project activities, including prevalent non-native grasses (i.e., cheatgrass, *Bromus tectorum*), weed species (i.e., fireweed [*Kochia scoparia*, Class B noxious weed], diffuse knapweed [*Centaurea diffusa*, Class B noxious weed]), some native grasses, sagebrush (*Artemisia tridentata*), rubber rabbit brush (*Ericaeria nauseosa*), pale-stemmed evening primrose (*Oenothera pallida*), prickly lettuce (*Lactuca serriola*), fiddleneck (*Amsinckia* spp.), mustards (*Brassica* spp.), and beavertail cactus (*Opuntia* sp.). Temporarily disturbed areas would be reseeded with regionally appropriate seed-mixes and vegetation-related BMPs would be implemented. Less than 1.5 acres of permanent vegetation removal would occur from the installation of the new access road and spurs.

With the revegetation of disturbed areas, and implementation of vegetation-related BMPs (e.g., clean construction equipment, vehicles, clothing and boots to reduce the likelihood of weeds and plant material transportation between sites), impacts to plants are expected to be low.

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

Potential for Significance: No with Conditions

Explanation: No federally-listed, special-status species or habitats exist within the project area. Documented wildlife species detected within 5 miles of the project site, but greater than 1 mile away, include the Washington ground squirrel (*Urocitellus washingtoni*, Oregon Endangered), the western burrowing owl (*Athene cunicularia hypugaea*), the grasshopper

sparrow (*Ammodramus savannarum*), the black-throated sparrow (*Amphispiza bilineata*), and the long-billed curlew (*Numenius americanus*). No Washington ground squirrels were detected during site visits or surveys.

Wildlife observations made during field investigations of the project area include pocket gopher (*Thomomys* sp.), kangaroo rat (*Dipodomys* sp.), coyote (*Canis latrans*), and badger (*Taxidea taxus*). No raptor nests were detected within a half mile radius of the project sites in the spring of 2025; however, the 9-mile area of the BOAD-ALK BOAD-ALKA-1 transmission line has had raptor nests built on the structure in the past.

Common wildlife species potentially using the project area may be temporarily affected during construction and some minor impacts to ground nesting or burrowing species may occur during project activities, but overall, impacts to wildlife and habitats are expected to be low.

Notes:

- Protocol surveys for the state Endangered Washington ground squirrel were performed in 2021 and 2022, and spot checks were performed in April 2025. ODFW Habitat Category 1 and 2 (OAR 635-415-0025(1)(2)) for the Washington ground squirrel does not occur within the project area.
- Oregon Department of Fish and Wildlife was consulted regarding the suitability of the habitat in the project area. BPA received confirmation that the likelihood of Washington ground squirrels in the project area would be unlikely due to the lack of suitable habitat, nearest proximity to known colonies, and barriers to migration into the project area.
- Should raptor nest(s) be rebuilt within half mile of a project site, then construction activities shall avoid the nesting period.

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

Potential for Significance: No

Explanation: No water bodies, floodplains or fish are present in the project area. Ground disturbing work would take place well away from the Columbia River and its tributaries such that construction would not lead to sediments or other material entering the water bodies. Therefore, the proposed action would have no impacts to water bodies, floodplains, or fish.

6. Wetlands

Potential for Significance: No

Explanation: No wetlands are present in the project area. Therefore, the proposed action would have no impacts to wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No areas of shallow groundwater or aquifers are known to exist within the project area. Subsurface work would be limited to auguring for new transmission structures. No hazardous materials beyond fuels and oils used in construction equipment would be used for the project, and spill remediation materials would be stored at the construction site to quickly contain any releases of oil or gas. Therefore, the proposed action would have no impacts to groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: There are no specially-designated areas within the project area and no changes to land use are proposed, apart from BPA acquiring a new 4-acre transmission line easement from the Port of Morrow to accommodate the BOAD-ALKA-1 transmission line being rebuilt

up to 150 feet west of its current location. The new easement area contains underground utilities, is sparsely vegetated by weed species, and appears relatively unused by the Port of Morrow. Therefore, the proposed action would have no impacts to land use or specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: Minor changes to visual quality would occur due to the installation of the new switch structures and new transmission line structures. However, the new and replacement equipment would be installed in areas where transmission lines are already prevalent on the landscape, the new and replacement structures would be of similar height and material as the existing structures, and visual receptors are low along the Interstate 84 corridor and near the substations. Therefore, impacts to visual quality are expected to be low.

10. Air Quality

Potential for Significance: No

Explanation: Minor and temporary vehicle and construction equipment emissions and fugitive dust would occur during construction. No new sources of emissions are anticipated once the project is constructed. Therefore, impacts to air quality are expected to be low.

11. Noise

Potential for Significance: No

Explanation: Minor and temporary vehicle and construction noise would occur during construction. There are no residences or sensitive noise receptors within one mile of project sites. The ambient noise levels at the various project sites (immediately south of busy Interstate 84 and near commercial processing centers) is moderate. Construction noise would be limited to working hours during the day and would only last for the duration of construction. Therefore, impacts to noise quality are expected to be low.

12. Human Health and Safety

Potential for Significance: No

Explanation: Contractors would follow BPA and OSHA safety standards and would submit a safety plan for BPA's review and approval prior to commencing construction work onsite. The project would not create any new safety hazards or use materials that could threaten human health and safety. No new 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's Real Property Services group is coordinating with Avangrid, the Port of Morrow, and Umatilla Electric.

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

Signed:

Becky Hill
Environmental Protection Specialist