

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Fall Protection Equipment Installation on the Ashe-Marion No. 2 Transmission Line

Project No.: P02459

Project Manager: Jim Barnhart, TIPL-TPP-1

Location: Clackamas and Wasco counties, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B2.3 Personnel safety and health equipment; B4.6 Additions and modifications to transmission facilities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to install human fall protection equipment on the Ashe-Marion No. 2 transmission line. About 125 structures would receive the new equipment between transmission line miles 162 and 191. Step bolts would be removed from the structures, flanges and/or latching human fall protection equipment would be installed, and the step bolts would be reinstalled. A battery-operated impact driver gun would be used to perform the work. Bucket trucks and ATVs would be used to access the structures via existing access roads and established direction of travel paths. Installation at each structure would take about 2 hours and no ground-disturbing activities or tree modification activities are proposed.

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 the current *DOE National Environmental Policy Act (NEPA) Implementing Procedures*, 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.

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Attachment(s): Environmental Evaluation

Categorical Exclusion Environmental Evaluation

This evaluation 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: Fall Protection Equipment Installation on the Ashe-Marion No. 2 Transmission Line

Project Site Description

The project site is within the BPA right-of-way corridor between transmission line miles 162 and 191 of the Ashe-Marion No. 2 transmission line. It is in the Cascade Mountain Range of Oregon with about 12 miles in Wasco County and about 20 miles in Clackamas County. Of the roughly 32-mile-long project site, about 13 miles are on the Confederated Tribes of the Warm Springs reservation and the remainder are on Mount Hood National Forest Clackamas River Ranger District-managed lands. Elevations range from about 2,000 feet above sea level to about 5,000 feet near Mount Wilson. The project site crosses Highway 26, Clackamas River Road, and several national forest roads.

The Ashe-Marion No. 2 transmission line crosses the Clackamas and Collawash rivers, which are Environmental Protection Agency (EPA) 303d-listed streams with National Wild and Scenic River System designations. These rivers are federally-designated freshwater critical habitat under the Endangered Species Act (ESA) and provide habitat to winter and summer steelhead, coastal cutthroat trout, coho, and spring Chinook salmon. The project site also spans several creeks and unnamed tributaries, providing habitat to other fish species. Per the USFWS National Wetland Inventory (NWI) database, the project site spans about 30 riverine wetlands and about 5 freshwater forested/shrub wetlands. The surrounding forest habitat between about line miles 181 and 191 was burned in the Austin Fire in August 2026.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The Ashe-Marion No. 2 transmission line was determined to be ineligible for listing in the National Register of Historic Places. Because the proposed action only affects the transmission line, the BPA historian and archaeologist determined on December 4, 2025, that no additional Section 106 of the National Historic Preservation Act consultation is required. The BPA determination cites Stipulation IA1 of a programmatic agreement among BPA, Oregon State Historic Preservation Office, Washington State Historic Preservation Office, Idaho State Historic Preservation Office, Montana State Historic Preservation Office, and the Advisory Council on Historic Preservation.

2. Geology and Soils

Potential for Significance: No

Explanation: There would not be any excavation or ground-disturbing activities when implementing the proposed action. Therefore, geology and soils would not be impacted due to implementation of the proposed action.

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

Potential for Significance: No

Explanation: The white bark pine tree is a federally-listed species under the ESA that is known to occur within 1 mile of the project area. The Mount Hood National Forest identified 8 lichen, 19 fungi, 35 bryophytes, and 52 vascular plant species that have a special-status designation and are known to occur within the Mount Hood National Forest. The Oregon Department of Agriculture identified 7 plant species in Clackamas County and 3 in Wasco County that are state-listed as endangered or threatened. None of these species have been documented within the project area. Furthermore, they are unlikely to occur in the project area because the right-of-way is routinely managed with brushing and herbicide application to maintain low-growing vegetation.

Vehicles and ATVs would travel on established gravel and two-track dirt access roads and direction of travel paths where access roads have not yet been established. In direction of travel paths to reach structures, vegetation may be temporarily crushed by vehicles and ATVs. Once at the structure, the new equipment would be installed on the legs of the structure. There would not be any excavation, ground-disturbing activities, or modifications to vegetation when installing equipment on the transmission structures.

Therefore, implementation of the proposed action (i.e., driving on direction of travel paths) may temporarily have a low impact on vegetation in the project area, including any culturally significant plants to the Confederated Tribes of the Warm Springs.

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

Potential for Significance: No with Conditions

Explanation: An ESA species list for the project area was obtained from USFWS on August 12, 2026. The list included the gray wolf (endangered; Mount Hood National Forest sensitive), the North American wolverine (threatened; Mount Hood National Forest sensitive), and the northern spotted owl (threatened). The Mount Hood National Forest designated a sensitive status for the Townsend's big eared bat, fringed myotis, Sierra Nevada red fox, Cope's giant salamander, Larch Mountain salamander, and 5 bird species (bald eagle, bufflehead, harlequin duck, Lewis's woodpecker, and the white-headed woodpecker).

The equipment installation process would take about two hours at each transmission structure and would temporarily increase noise levels in the local area. It is anticipated that wildlife would use adjacent habitat and return to the area soon after the completion of work. Therefore, the project may have small, temporary impacts to general wildlife species in the area due to elevated noise levels (i.e., vehicles, ATVs, impact driver guns) and human presence.

Cope's giant salamanders use riparian and aquatic habitats, and Larch Mountain salamanders are limited in range to the Columbia River Gorge National Scenic Area of the Mount Hood National Forest. No project activities would occur in these areas. An Oregon slender salamander (federally-listed species of concern) detection is recorded about 150 feet away from the project area. However, this terrestrial species has a small home range (i.e., less than 1 meter) and inhabits large diameter decaying logs found in closed canopy forest habitat, which does not occur in the project area. Therefore, these amphibian species would not be impacted due to implementation of the proposed action.

It is highly unlikely that a bat or myotis would rest or roost on a steel-lattice transmission structure due to lack of suitable refuge habitat. The highly aquatic bufflehead and harlequin ducks, and forest-dwelling woodpeckers are also unlikely to use the transmission structures or access roads due to lack of suitable habitat. If a bat, myotis, or birds are nearby when project activities commence, they may temporarily exit the area due to the intermittent, yet temporary noise. It is anticipated that they would return after the work is complete with minimal disturbance. Therefore, it is unlikely, but possible, these species would incur a low impact due to implementation of the proposed action.

No bald eagle nests have been documented within 1 mile of the project area. If a foraging and dispersing bald eagle was in the project area when project activities commence, they may temporarily exit the area due to the intermittent and temporary noise. It is anticipated that they would return after the work is complete with minimal disturbance.

Based on the ESA review conducted, BPA made a determination that the project would be consistent with scope of activities and action area evaluated in the USFWS' Biological Opinion (BiOp) and letter of concurrence regarding BPA Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. All terms and conditions and conservation measures identified in these consultations would be incorporated into the contractor's work plan.

Notes:

- The Warm Springs gray wolf pack (Mount Hood National Forest sensitive; ESA-listed endangered) is known to reside near the project area per Oregon Department of Fish and Wildlife's Area of Known Wolf Activity mapping tool. Potential impacts to wolves would be from noise disturbance but they would be temporary. Throughout much of the year, gray wolves are very mobile covering large areas and if disturbed by project noises, the wolves would likely just move to other areas. It is unknown if wolf dens or rendezvous sites are within 1 mile of the project area. Therefore, gray wolf presence is assumed by BPA and seasonal timing restrictions (April 1 to July 15) would be implemented. Therefore, with the seasonal timing restrictions, the effects to the gray wolf are insignificant and discountable.
- North American wolverines (Mount Hood National Forest sensitive; ESA-listed threatened) historically occupied the Wallowa Mountains. More recently, confirmed locations include Three-fingered Jack in Linn County, the Steens Mountains in Harney County, and Broken Top Mountain in Deschutes County, Oregon. While they prefer high-altitude habitats, dispersing individuals may travel through lower-elevation areas that do not typically support permanent high-elevation wolverine populations. North American wolverines are extremely rare in Oregon and travel large distances while dispersing. The likelihood of a wolverine entering the project area while project activities are occurring is low. Impacts to dispersing individuals from the increased noise levels and human presence are anticipated to be insignificant.
- The montane-dwelling Sierra Nevada red fox (Mount Hood National Forest sensitive; Oregon Conservation Strategy Species) traditionally inhabits areas above 4,500 feet in elevation and the nearest population is on the east slope of Mount Hood, about 25 miles north of the project area. The likelihood of a Sierra Nevada red fox entering the project area is unlikely. Increased project noise levels and human presence are not anticipated to impact the Sierra Nevada red fox.
- The right-of-way corridor between structures 165/3-166/2 and 174/2-174/3 has northern spotted owl (ESA-listed threatened) detections within 65 yards (i.e., Disruption Distance). Per Appendix G of the BiOp, only one day of work that produces noise may be performed during the critical breeding period (March 1 to July 15) in these specific spans. However, there are no timing restrictions between July 16 and April 30.
- The right-of-way corridor between structures 162/4-165/2, 166/3-174/1, and 175/1-191/1 have northern spotted owl detections less than 0.25-mile, but greater than 65 yards away (i.e., Disturbance Distance). In these areas, more than one day of work may be performed during critical breeding period (March 1 to July 15), and no timing restrictions are necessary between July 16 and April 30.
- Northern spotted owl designated critical habitat exists between structures 176/3-179/3 and 182/5-191/4. Implementing the proposed action would not modify northern spotted owl habitat (i.e., nesting, roosting, foraging, dispersing habitat). Therefore, BPA determined implementation of the proposed action would have no adverse modification to northern spotted owl designated critical habitat.

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

Potential for Significance: No

Explanation: The project area spans the Clackamas and Collawash rivers, which have EPA 303d and National Wild and Scenic River System designations. These rivers are ESA-designated freshwater critical habitat for steelhead (Lower and Middle Columbia River ESU; state sensitive; federally-listed as threatened), coho (Lower Columbia River ESU; state-listed as

endangered; federally-listed as threatened), and Chinook salmon (Upper Willamette River ESU; state and federally-listed as threatened).

In addition to those anadromous fish, coastal cutthroat trout (Lower Columbia Coastal Cutthroat SMU; state sensitive critical), bull trout (state sensitive critical and federally-listed as threatened), and other fish also inhabit the Clackamas and Collawash rivers, and their tributary streams and creeks which also occur in the project area.

The Mount Hood National Forest lists coastal cutthroat, Pacific lamprey, and inland Columbia Basin redband trout as sensitive.

The existing transmission line spans water bodies and the new equipment would be installed on the steel-lattice structure legs. The project does not include excavation, ground-disturbing, or in-water activities. Therefore, implementing the proposed action would not impact water bodies, floodplains, fish, or freshwater designated critical habitat.

6. Wetlands

Potential for Significance: No

Explanation: The NWI-mapped wetlands in the project area are spanned by the existing transmission line. Vehicle and ATV travel would be on established access roads and direction of travel paths that would not travel through wetlands. There would not be any excavation or ground-disturbing activities when implementing the proposed action. Therefore, wetlands would not be impacted due to implementation of the proposed action.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: There would not be any excavation or ground-disturbing activities when implementing the proposed action. Therefore, groundwater and aquifers would not be impacted due to implementation of the proposed action.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Installing human fall protection equipment on existing transmission structure legs is consistent with the current transmission line right-of-way land use and would not interfere with special designations (i.e., EPA 303d listing, National Wild and Scenic River System, Confederated Tribes of the Warm Springs reservation). Therefore, land use and specially-designated areas would not be impacted due to implementation of the proposed action.

9. Visual Quality

Potential for Significance: No

Explanation: Installing relatively small pieces of human fall protection equipment on the existing, relatively large, 500 kV transmission line structure legs would be a negligible visible change. The new equipment would be consistent with the current visual quality of the project site. Therefore, visual quality would not be impacted due to implementation of the proposed action.

10. Air Quality

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during project implementation. However, there would be no substantial changes to air quality during or after implementation of the proposed action.

11. Noise

Potential for Significance: No

Explanation: Ambient noise in the remote and forested areas surrounding the project area is relatively quiet. A battery-operated impact driver gun (about 90-100dB at the source, and about 85dB at 50 feet away) would be used to perform the work. ATV and impact driver noise would be noticeable to the local area, yet it would be temporary and intermittent. There would be no long-term operational noise after installation. Therefore, implementation of the proposed action may have a low impact on noise.

12. Human Health and Safety

Potential for Significance: No

Explanation: During project implementation, all standard safety protocols would be followed. Therefore, human health and safety would not be impacted due to implementation of the proposed action.

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 coordinate with the Confederated Tribes of the Warm Springs and the Mount Hood National Forest Clackamas River Ranger District prior to entering those lands.

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

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