Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Roundup-La Grande Gas Line Locating

Project Manager: Rusty Ludt - TIPL-TPP-1

Location: Umatilla and Union Counties, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B3.1 Site Characterization and Environmental Monitoring

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to conduct potholing in 17 work areas to locate underground gas pipelines in support of planning and design of its proposed Roundup-La Grande No. 1 Wood Pole Transmission Line Rebuild Project in Umatilla and Union counties, Oregon. Environmental compliance, including NEPA analysis, will be conducted for the transmission line rebuild project in the future.

The proposed project would conduct potholing, as described further below, to locate underground pipelines to inform the project design between towers 19/1 and 38/4. Four underground pipelines, including two Marathon high-pressure petroleum pipelines and two Williams natural gas pipelines, cross the Roundup-La Grande transmission line rights-of-way (ROW) in multiple locations. Potholing is needed because the pipeline companies' locating equipment cannot accurately locate the pipelines due to interference from the transmission lines. At each work location the crew would first narrow down the pipeline location using ground penetrating radar, then pothole to verify the exact location and depth of the pipelines. If the first pothole is unsuccessful in locating the pipeline, additional potholes may be required within a work area.

Potholing would include use of hydro-excavation equipment and hand-dug pits. The hydro-excavation method consists of using high-pressure water to first loosen the soil and then a vacuum system to remove the material. The excavated potholes would be approximately 2-3 feet in diameter and the depth would be dependent on the depth of the pipelines. Once the pipeline is exposed and documented, the excavation would be backfilled with sand and salvaged topsoil. A native seed mix would be applied to the excavation area. The work areas would be accessed via existing access roads; no access road work is proposed for the potholing work.

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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Concur:

KATEY GRANGE

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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: Roundup-La Grande Gas Line Locating

Project Site Description

The proposed potholing sites are located within the Roundup-La Grande ROW where it crosses the summit of the Blue Mountains, roughly paralleling Interstate 84. The Blue Mountains in this area consist mostly of a gently rolling high plateau, interspersed with small drainages and canyons. Forested and grassy areas are interspersed throughout the project area. A deeper canyon where the line crosses the Grande Ronde River is located on the eastern edge of the project area, but the work would take place on the gentler slopes above the canyon.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Pursuant to Section 106 of the National Historic Preservation Act, BPA initiated consultation and determined the rebuild project's area of potential effects (APE) with the Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, Oregon Department of State Lands, Oregon Parks and Recreation Department, Oregon State Historic Preservation Office (SHPO), and U.S. Forest Service (USFS) on June 26, 2024 (BPA CR Project No. OR 2021 138; SHPO Log No. 2026-04-02750). After receiving comments from the Confederated Tribes of the Umatilla Indian Reservation, BPA sent out an amended initiation letter on July 1, 2025. No other comments were received. Archeological surveys were conducted for the rebuild project that included the proposed potholing work areas.

On May 12, 2026, BPA sent out consultation materials for geotechnical testing. No comments were received. After initiating consultation, BPA determined the need to complete potholing to locate underground pipelines and additional geotechnical borings to inform the design at specific locations. BPA consulted on the potholing and additional geotechnical investigations with USFS on September 21, 2026 and with the Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, and Oregon SHPO on October 7, 2026. Comments were received from the Confederated Tribes of the Umatilla Indian Reservation.

None of the potholing locations are in any identified archeological sites. Due to the disturbed nature of the ground from installation of the gas pipelines, the likelihood of encountering previously unidentified cultural resources is low. One isolate was identified near a potholing location and a cultural resources site boundary extends across an access road that would be used to access a potholing work area but would not be otherwise disturbed. Potholing would avoid the isolate and crews would limit vehicle traffic along the access road to the existing graveled road prism to avoid effects to the site. The Roundup-La Grande Transmission Line is within the APE, but it would not be affected by the potholing.

Therefore, in accordance with 36 CFR 800.4(d)(1), BPA has determined that the implementation of the potholing would result in no historic properties affected with the stipulation of having a monitor present during the potholing activities. No to low impacts to cultural resources are expected.

Notes:

A cultural resources monitor would be present during the potholing activities.

In the unlikely event that cultural material is encountered during the potholing and geotechnical investigations, BPA's Post-Review Discovery of Cultural Material Procedure would be followed. Work would be halted in the vicinity of the find, and BPA would be contacted for further required notifications. The integrity of the site and material would be protected until further instructions are given.

2. Geology and Soils

Potential for Significance: No

Explanation: The potholing process involves the removal of soil from above the gas pipelines. The majority of these soils have already been disturbed during the installation of the pipelines. Once the holes have been excavated and pipe locations confirmed, the holes would be backfilled with sand and topsoil and tamped down to match existing contours. The soil disturbance area in each of the 17 locations would be small and localized. None of the pothole locations are located on steep slopes. The disturbed areas would be revegetated with a native seed mix. Due to the minimal area of soil disturbed, the lack of steep slopes and the short duration of bare soil exposure before revegetation, the likelihood of soil eroding or moving off site is limited. Impacts to soils and geology are expected to be **low**.

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

Potential for Significance: No

Explanation: No rare plants or federally listed plant species were identified within the project area. Plants growing within the BPA ROW in the potholing sites are limited to mostly grassy and weedy species with some brushy areas. Plant removal would be limited to the immediate potholing locations, although equipment accessing the locations would crush and disturb nearby plant populations. Disturbed areas with exposed soils would be replanted with a native seed mix to facilitate rapid revegetation. Impacts to plants are expected to be **low**.

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

Potential for Significance: No

Explanation: Surveys for wildlife associated with the Roundup-La Grande Rebuild Project did not find any sensitive or federally listed species present within the project area. The work would take place in early November, avoiding the breeding season for most birds and mammals. The potholing equipment would generate noise which could disturb common wildlife species that may happen to be near a potholing location. The potholing work would take a day or less at each site, so wildlife impacts would be limited in duration. Impacts to wildlife are expected to be **low**.

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

Potential for Significance: No

Explanation: The proposed potholing work would take place in upland areas well away from streams, floodplains, or other water bodies. The closest stream is approximately 250 feet from a potholing location, with heavy vegetation in between. No sediment is expected to move from a potholing location into local waterbodies. There would be **no** impacts to water bodies, floodplains, or fish.

6. Wetlands

Potential for Significance: No

Explanation: Wetland surveys were conducted along the entire Roundup-La Grande ROW for the rebuild project. None of the potholing locations are located in or near wetlands. There would be **no** impact to wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: There are no groundwater areas or aquifers identified within the project area and the potholing work would only remove a small area of soil 2 to 3 feet deep at any given location. There would be **no** impact to groundwater and aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: All work would take place within the existing ROW where BPA has rights to do this type of work. Some of the proposed pothole locations are located on US Forest Service lands. The Wallowa-Whitman National Forest was notified of the proposed work. There are no specially-designated areas in or near the project area. Recreational use does occur in the area, including hunting and off road vehicle use. All of the potholing locations are located near noise-producing uses such as I-85, railroads, development, or highways and hunter concentration is expected to be low. Impacts to hunters from noise and general disturbance would be of short duration and would not cause permanent impacts to game animals. No impacts to off road vehicle use are expected. There would be **no** to **low** impact to land use or specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: Construction equipment may be temporarily visible during construction but there are no sensitive viewer areas. The potholing work would create very small areas of exposed soil that might be visible before revegetation. Impacts to visual quality are expected to be **low**.

10. Air Quality

Potential for Significance: No

Explanation: The potholing activities may release minor amounts of dust but most of that would be captured by the potholing equipment as it removes soil from the potholing locations. Some minor exhaust emissions would occur from operation of the potholing equipment and support vehicles. Impacts to air quality are expected to be **low**.

11. Noise

Potential for Significance: No

Explanation: The equipment used for potholing (vacuum trucks) can be loud; however, the location of the proposed potholes is far away from sensitive noise receptors (schools, residences, and other human use areas). The duration of each potholing effort would be limited to a day or less at each site. Impacts to noise are expected to be **low**.

12. Human Health and Safety

Potential for Significance: No

Explanation: None of the potholing sites are located in areas that have been subject to land uses other than forestry or utilities and there are no documented areas of hazardous materials that could be disturbed by the potholing work. Potholing was determined to be the safest method of finding the gas lines as it is the method least likely to damage the pipeline and

create a gas leak or explosion. There are no population centers or areas where people congregate near the work areas so potential damage to the pipeline would have a limited effect to the crews working at the site. Impacts to human health and safety would be **low**.

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: Affected landowners will be notified of the potholing work prior to it occurring.

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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