

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Ashe – Marion No. 2 Urgent Fitting Replacements Line Mile 200 to 202

**PP&A No.:** 4,747

**Project Manager:** Dianne Bonner, TEPL-TPP-1

**Location:** Clackamas County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine Maintenance; B3.2 Aviation activities

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to remove and replace certain fittings used to splice lengths of transmission line cable together on two transmission lines in Oregon. As part of BPA's wildfire mitigation effort, BPA noted that certain fittings used to splice lengths of transmission line cable together have the potential to fail causing the wires to fall to the ground which increases the potential to start wildfires. BPA crews have identified those fittings most at risk for failure where urgent replacements are needed. BPA would like to reduce wildfire risk by completing replacements of fittings with the greatest potential for failure before the 2022 wildfire season. Replacement work was scheduled for November 2021, but due to inclement weather, some work was postponed into April of 2022. This work was initially included in a CX dated October 15, 2021, but was delayed, so this CX reflects the change to work schedule.

BPA proposes to replace fittings on the Ashe-Marion No. 2 and Buckley-Marion No. 1 lines at line miles 200 and 202 of the Ashe-Marion No. 2 line, utilizing Human External Cargo (HEC), or a crew suspended from a helicopter. For replacements on these lines, helicopter landing would be necessary for helicopters to land and take off, as well as for staging crew and equipment. In some cases, new routes of travel would be necessary to access helicopter landing zones. No improvements to, grading of, or other ground disturbing work for helicopter landing zones or access roads is anticipated. Large flatbed trucks or similar vehicles would be used to haul materials and equipment but use of loaders, excavators, or other heavy equipment is not anticipated.

**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), 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.

*/s/ Aaron Siemers*  
Aaron Siemers  
Physical Scientist

Concur:

*/s/ Katey Grange*  
Katey C. Grange                      Date: April 1, 2022  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

# 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:** Ashe – Marion No. 2 Urgent Fitting Replacements Line Mile 200 to 202

## **Project Site Description**

The project area is located in Clackamas County, OR and is primarily forested. Work would occur on privately-owned lands in addition to lands managed by the US Forest Service (Mt. Hood National Forest) and US Bureau of Land Management.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No Potential to Cause Effects

Explanation: On August 13, 2021, BPA received a finding of no effect from the Mount Hood National Forest Heritage Program. The proposed project meets the criteria for Standard Case-By-Case Review by the Oregon State Historic Preservation Officer and the Advisory Council on Historic Preservation under terms of the 2004 Programmatic Agreement (Stipulation III (A) 3.15).

On September 29, 2021, BPA received a BLM Oregon Cultural Resource Information System (OCRIS) Project (Undertaking) Tracking Form with a no effect determination. The Undertaking Decision by BLM meets the qualification of a reduced or exempted inventory under Appendix E and is a small project (<10 acres or <2 linear miles). The portion of the project located on BLM lands may proceed without any further Section 106 consultation or review.

Based on the information provided for this project, BPA concurs with Mount Hood National Forest Heritage Program's finding of no effect for SZ1a, SZ1b, SZ1c.

For the portions of the project located on private lands, BPA determined, per 36 CFR 800.3(a)(1), that this project is a type of activity that does not have the potential to cause effects on historic properties for LZ2 and SZ2 located on private property, assuming such historic properties were present.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: No ground disturbance is anticipated.

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

Potential for Significance: No with Conditions

Explanation: Minimal disturbance to vegetation is anticipated. There would be no effect to ESA-listed plant species. No impacts to state, US Bureau of Land Management, or US Forest Service sensitive species are anticipated.

In addition, on National Forest System lands managed by Mt Hood National Forest, BPA would comply with the Standard Operating Procedures for limiting the spread of invasive species and fire prevention as directed in the Federal Land Policy and Management Act (FLPMA).

Notes: The following minimization measures would be implemented to minimize vegetation impacts.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal

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

Potential for Significance: No with Conditions

Explanation: In general, the project would have temporary impacts to wildlife and habitat related to disturbance associated with elevated helicopter and equipment noise and human presence. However the surrounding forest provides ample habitat and cover for disturbed wildlife.

Due to inclement weather, the project schedule was pushed from fall of 2021 into spring of 2022, which is within the northern spotted owl critical nesting period. Suitable and highly suitable spotted owl habitat is present in the project area, according to the NW Forest Plan's habitat model for spotted owl. Northern spotted owl critical habitat is located less than a mile from the project area to the east. In order to comply with the Endangered Species Act, BPA consulted with US Fish and Wildlife Service (USFWS) and the Bureau of Land Management (BLM). In accordance with the consultation, BPA conducted biological surveys in the project area in the weeks prior to helicopter operations to assess the presence of spotted owls in the project area. During the surveys, no spotted owls were detected. In coordination with USFWS and BLM, the project activity falls under the Willamette Planning Province's Biological Assessment for Timber Harvest and Routine Activities that are Likely to Adversely Affect Listed Species and Critical Habitat on the Columbia River Gorge National Scenic Area, Mt. Hood National Forest, Willamette National Forest, and the Northwest Oregon BLM District (USDI, 2019).

Due to the apparent lack of spotted owls in the immediate project area, and in accordance with the BLM's Biological Opinion, BPA has determined that the project "*May affect, but is not likely to adversely affect*" northern spotted owl.

BPA has determined that the project would have "*No Effect*" on other ESA-listed wildlife species and would not significantly impact BLM and U.S. Forest Service sensitive species.

Notes: The following minimization measures would be implemented to minimize impacts to wildlife and their habitat.

- Avoid flying over suitable spotted owl habitat unless absolutely necessary
- Fly helicopter at least 110 yards above the tree line when possible
- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal

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

Potential for Significance: No with Conditions

Explanation: There would be no ground disturbing activities in any river, stream, or other waterbody along the project and no riparian vegetation would be impacted. The project would have no effect to ESA-listed fish species.

Notes: The following minimization measures would be implemented to prevent sediment or contaminants from reaching any waterbodies.

- Erosion control measures would be implemented to prevent sedimentation or dust.
- Appropriately stocked spill response kits would be located on vehicles and landing zones used on this project.

## 6. Wetlands

Potential for Significance: No

Explanation: There would be no ground disturbing activities in wetlands along the project.

## 7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: No impacts to ground water or aquifers are anticipated due to the lack of ground disturbance.

Notes: The following minimization measures would be implemented to minimize groundwater contamination potential.

- Appropriately stocked spill response kits would be located on vehicles, other equipment, fly yards used on this project.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No with Conditions

Explanation: No change in land use would occur and project activities would not impact existing land uses.

Notes: The following minimization measures would be implemented to minimize impacts to land use and specially designated areas.

For those portions of the project crossing the Mt. Hood National Forest and the Lolo National Forest, the *Memorandum of Understanding between the Bonneville Power Administration United States Department of Energy and the United States Forest Service United States Department of Agriculture Regarding Transmission Facilities and Access to Those Facilities on National Forest System Lands Standard Operation Procedures* listed below would be implemented:

- **Section VIII** Emergency maintenance
- **Section X** Fire control communication and coordination
- **Appendix E** Fire Prevention and Suppression

## 9. Visual Quality

Potential for Significance: No

Explanation: The project would have a minimal impact to visual quality. Replacement fittings would be similar to the existing fittings, and consistent with other fittings along the transmission line.

## 10. Air Quality

Potential for Significance: No

Explanation: A small amount of vehicle emissions and dust may occur temporarily during construction.

## 11. Noise

Potential for Significance: No

Explanation: Some temporary construction noise from construction activities and helicopter use would occur during daylight hours. The operational noise of the transmission line would not change.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: BPA's electrical contractor performing the work would submit a Safety Plan to BPA for approval prior to construction start. The project would lower the risk of conductor failure and potential fire.

### 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 realty and environment have coordinated the proposed project activities with Mt Hood National Forest, Bureau of Land Management, and private landowners.

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

Signed: /s/ Aaron Siemers  
Aaron Siemers, EPR-4  
Physical Scientist

Date: April 1, 2022