

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Operation of Small Unmanned Aerial Systems throughout the BPA Service Territory

Project Manager: James May, TAA-HANGR

Location: Multiple locations in California, Idaho, Montana, Nevada, Oregon, Utah, Washington, and Wyoming

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 operate or contract the operation of small unmanned aerial systems (sUAS, also known as “drones”) throughout the BPA service territory in California, Idaho, Montana, Nevada, Oregon, Utah, Washington, and Wyoming. BPA could use drones for a range of survey, monitoring, media, and security activities, including (but not limited to):

- Project engineering and design surveys (e.g., pre-project data collection, land surveys, as-built surveys)
- Environmental surveys (e.g., habitat assessments, environmental and cultural resources surveys, fish and wildlife population monitoring, post-construction restoration monitoring)
- Routine maintenance and operation of the bulk electric system (e.g., vegetation monitoring and danger tree identification, substation and transmission line inspections)
- Media services (e.g., photography and videography for agency communications including public meetings, education, publications, and informational campaigns)
- Security and emergency response (e.g., remote response to security alarms, natural disaster damage assessments)

Drones would only be operated by licensed professionals and in compliance with Federal Aviation Administration (FAA) regulations under 14 CFR Part 107, with Department of Energy (DOE) policy directives in ***Aviation Management and Safety*** (DOE Order 440.2C), and with BPA procedures outlined in ***sUAS Training and Standard Operating Procedures***. Prior to each flight, BPA procedures would require pilots and operators to document pre-flight risk assessments to identify and set forth operational parameters, hazards, and controls.

Drones would be hand-launched or launched from existing graveled or paved surfaces or temporary pads, and no construction of new access roads or permanent launch pads would be authorized. Similarly, no ground disturbance or vegetation clearing would be authorized. To access launch sites, passenger vehicles would be required to remain on authorized roadways.

Drones would only be operated on BPA fee-owned property or property where BPA has an existing agreement with or authorization from the underlying landowner (e.g., BLM, Tribes, private). BPA procedures would require pilots and operators to acquire the necessary authorizations from the underlying landowner, if required.

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/ Walker Stinnette

Walker Stinnette

Environmental Protection Specialist

Concur:

Katey C. Grange
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: Use of Small Unmanned Aerial Systems throughout the BPA Service Territory

Project Site Description

Bonneville Power Administration (BPA) proposes to use drones at multiple field sites throughout the BPA service territory in California, Idaho, Montana, Nevada, Oregon, Utah, Washington, and Wyoming.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The operation of drones would not result in ground disturbance that could potentially impact archaeological resources and would not require modifications to existing built historic resources. Therefore, the proposed undertaking would have no potential to cause effects to historic properties.

2. Geology and Soils

Potential for Significance: No

Explanation: The operation of drones would not result in ground disturbance. Therefore, the proposed action would not impact geology and soils.

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

Potential for Significance: No

Explanation: The operation of drones would not result in ground disturbance, and no vegetation removal or management would be authorized. Therefore, the proposed action would have no effect on plant species or habitats.

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

Potential for Significance: No with Conditions

Explanation: Minor and temporary disruption of normal wildlife behavior could occur from drone operation, mainly during takeoff and landing. The majority of each flight path would occur within airspace well above the tree line and away from wildlife habitat. In some cases, drone operations would replace other types of actions with potentially greater levels of disturbance (e.g., helicopter use or boots-on-the-ground). There would be little to no risk of direct mortality from collision with a drone. Drone operations would be infrequent in a given area and short in duration and would not lead to permanent adverse modification of suitable wildlife habitat. Therefore, the proposed action would not be expected to substantially effect wildlife and would have no permanent effect on wildlife habitat.

Notes:

- Drones would be launched and operated no closer than 100 meters from known or suspected wildlife populations.
- Drones would not be operated over or near wildlife and approaching wildlife from above would not be permitted, particularly during breeding, nesting, rearing, or other critical life history functions.
- Drones would not be operated within the disturbance limits of known or suspected populations of special-status wildlife species (e.g., ESA-listed, state-listed or state-sensitive, migratory birds, bald and golden eagles) without implementing avoidance and minimization measures (e.g., daily and seasonal timing restrictions, disturbance buffers, and additional species-specific measures, as required). These avoidance and minimization measures would be included in pre-flight risk assessments, as necessary.
- In the unlikely event that the operation of drones inadvertently has an effect on wildlife species, BPA would require that the flight be immediately grounded until a BPA environmental lead can assess the effects in consultation with appropriate wildlife management agencies.

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

Potential for Significance: No

Explanation: The operation of drones would not result in ground disturbance, and no in-water work would be required. Therefore, the proposed action would not impact water bodies and floodplains and would have no effect on fish species or habitats.

6. Wetlands

Potential for Significance: No

Explanation: The operation of drones would not result in ground disturbance, and no vegetation removal or management would be required. Therefore, the proposed action would not impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The operation of drones would not involve hazardous materials that could impact groundwater and aquifers. No new wells or other uses of groundwater or aquifers are proposed. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The operation of drones could temporarily generate localized noise above typical ambient conditions, which could impact certain land uses (e.g., recreation, residential, etc.). However, the operation of drones would not restrict access to any area open to the public. Prior to operating a drone, BPA would identify specially-designated areas within the flightpath and would comply with all associated guidelines and regulations for drone use, if required. There would be no permanent change in land use following completion of a flight.

Notes:

- BPA and its contractors would consult with the underlying land manager to ensure that drone use is consistent with existing land management plans.

9. Visual Quality

Potential for Significance: No

Explanation: Drones and drone operators could be temporarily visible to individuals near a flight path. However, drones are small relative to the skyline and landscape and would not be present in a given area for extended periods. The proposed action would not result in long-term or permanent visual quality impacts.

10. Air Quality

Potential for Significance: No

Explanation: Drones are battery-powered and do not directly generate emissions; although minor emissions could be indirectly associated with battery charging via the bulk electrical system. Depending on the launch surface, drone takeoff and landing could create a minor amount of dust. Transportation of personnel and equipment to drone launch sites would result in minor and temporary dust and vehicle emissions. The proposed action would not result in permanent impacts to air quality.

11. Noise

Potential for Significance: No

Explanation: The operation of drones and increased human activity around drone launch sites and flight paths would result in minor and temporary noise during daylight hours, which could exceed ambient conditions at some locations. The proposed activities would not result in long-term or permanent noise impacts.

12. Human Health and Safety

Potential for Significance: No

Explanation: Drones would only be operated by licensed professionals and in compliance with all applicable state, local, and Federal regulations. Prior to each flight, an aviation Safety Plan would be completed to identify and set forth operational parameters, hazards, and controls. Therefore, the proposed action would not be expected to impact human health and safety.

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: The proposed action would occur on BPA fee-owned property or on property where BPA has an existing agreement with or authorization from the underlying landowner. Prior to drone operation, BPA would identify any local airspace and flight restrictions and would obtain flight permissions from the applicable authorities.

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

Signed: /s/ Walker Stinnette June 2, 2023
Walker Stinnette, ECT-4 Date
Environmental Protection Specialist