**Proposed Action:** Wood Pole Replacement on the LaPine-Chiloquin Transmission line 2018.

**PP&A Project No.:** 3624

**Project Manager:** Gerri Colburn – TEPO-TPP-1

**Location:** Klamath County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine maintenance

**Description of the Proposed Action:** BPA proposes to replace deteriorating wood-pole structures (including cross arms, insulators, guy anchors, etc.) on the La Pine - Chiloquin transmission line. Replacement would be in-kind, having the same height and configuration as the original. New poles would either be placed back in existing holes, or an auger attached to a backhoe would be used to drill new holes approximately 5 feet ahead or back on-line, from existing poles. Unless further limited to protect sensitive plants, ground disturbance would not extend beyond the width of the right-of-way and 100 feet on each side of the structure. Maintenance or improvement of landings may be required to allow for safe working conditions.

Heavy equipment would be used to conduct the work and would include the following: pole truck, dump truck with trailer, backhoe, crane, boom truck, bucket truck, work trucks with trailers, and bulldozer. All heavy equipment would be cleaned prior to entering Forest Service lands to ensure they are free of soil, seeds, and plant propagules. Equipment and materials would be staged only in designated areas agreed to in advance with the Forest Service. Once work is completed all equipment and debris would be removed from the project area.

No unauthorized construction activities would occur in any water body including streams, ponds, or wetlands.

The proposed action would help reduce outage times and maintain reliable power in the region. All work would be in accordance with the National Electrical Safety Code and BPA standards.

<table>
<thead>
<tr>
<th>Transmission Line/ROW</th>
<th>Structure #</th>
<th>Township</th>
<th>Range</th>
<th>Section(s)</th>
<th>County</th>
<th>Ownership/Land Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>LaPine-Chiloquin No. 1</td>
<td>23/6, 24/5, 24/6, 24/8, 25/1, 25/2, 25/3, 25/4, 25/5, 25/7, 26/2</td>
<td>25S</td>
<td>09E</td>
<td>29, 30, 31</td>
<td>Klamath</td>
<td>USFS/Forest</td>
</tr>
<tr>
<td></td>
<td>26/7, 27/1</td>
<td>25S</td>
<td>08E</td>
<td>36</td>
<td>Klamath</td>
<td>USFS/Forest</td>
</tr>
</tbody>
</table>
**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, July 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/ Fred Walasavage  
Fred Walasavage  
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer

Date: June 12, 2018

Attachment(s):  
Environmental Checklist  
Effects Determination for T&E Species
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:** Wood Pole Replacement on the LaPine-Chiloquin Transmission Line

---

**Project Site Description**

The project activities would be conducted on BPA Transmission line rights-of-way. The project is primarily located on the Deschutes and Winema National Forests. The project area consists of rolling terrain. Vegetation on the rights-of-way consists of grasses and steppe shrubs.

---

**Evaluation of Potential Impacts to Environmental Resources**

<table>
<thead>
<tr>
<th>Environmental Resource</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

Section 106 documentation was submitted by the USFS to SHPO regarding the 2018 Pole Replacement Project on April 20, 2018. It was received and processed by SHPO on April 22, 2018 and assigned Case# 18-0442. SHPO concurred with the *No Adverse Effect* determination regarding above-ground resources (the transmission line itself) on May 10, 2018. As of June 12, 2018, no additional correspondence has been received from SHPO regarding this project, particularly relating to below-ground resources. As the 30-day consultation window ended on May 22, 2018, concurrence from SHPO is assumed. Klamath Tribes, Burns Paiute Tribe, and Warm Springs Tribes consulted—no response received.

In the event of an inadvertent discovery, work would immediately cease and the SHPO and BPA archaeologist would be notified.

| 2. Geology and Soils | ✓                             |                                             |

**Explanation:** The project would require minimal ground-disturbing activities. No prime or unique farmlands would be affected. On Forest Service land, use appropriate native seed mixtures for low-growing species, as designated by Forest Service revegetation specialists, provided that Forest Service revegetation specialists may allow non-invasive, non-native species to be used when they deem it necessary.

| 3. Plants (including federal/state special-status species) | ✓ |                   |

**Explanation:** The four miles of transmission line within the project area are within known areas that contain the pumice moonwort (*Botrychium pumicola*), a Forest Service R6 Sensitive species and State-listed (for Oregon) Threatened species. Populations are localized within this area. The majority of structures (24/5, 24/6, 24/8, 25/1, 25/4, 25/5, 26/2, 27/1) do not contain suitable habitat or known viable populations. Because the pumice moonwort sites are located away from the disturbance footprint of the poles listed above, the pole replacement would not directly impact any of these sites. As the sites are either fenced or flagged, there would also be no impact from...
Equipment being inadvertently staged on top of these protected areas.

Structures 25/3 and 26/7 do have known populations. Due to a large population surrounding structure 26/7, the structure would be relocated 300 feet ahead on line. Impacts to the pumice moonwort would likely be encountered during the retirement of the existing structure at 26/7. To minimize impacts, poles would be cut at ground surface with butts left in place. Anchor cables would be removed and the below ground footing would be left in place. The Forest Service would mark out two vehicle approach areas necessary for structure removal that would represent the least amount of impact to the pumice moonwort. The Forest Service would be responsible for flagging pumice moonwort within the work area so they are visible and can be avoided by workers. Work would be conducted in the fall timeframe. Structure 25/3 has habitat at 56’ to the north and 90’ to the south. The Forest Service would be responsible for flagging pumice moonwort within the work area so they are visible and can be avoided by workers.

Access to the structures within the proposed project area would be limited to existing roadways and landings. Staging areas would be on previously-disturbed areas with no known populations of pumice moonwort or in areas as approved by the Forest Service.

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

   | Explanation: The following are excerpts from the 2017 BPA Corridor Maintenance and Pole Replacement Project Wildlife Report prepared by the Forest Service on April 12, 2017.
   |  
   | There is no habitat for any Threatened and Endangered species except the gray wolf. The proposed project would not alter deer or elk habitat nor change how wolves would use the area. There would be no effect to any Threatened and Endangered species.
   |  
   | The FS assessed the potential impact to FS sensitive species and determined that the proposed action would have no effect on bats and may impact individuals or habitat, but will not likely contribute to a trend toward federal listing or loss of viability to the population or species of white-headed woodpeckers, Johnson’s hairstreak, western Morrison, and Suckley cuckoo bumble bee. There is no habitat for any other sensitive species. Implementation of the project would have no impact to any other FS sensitive species.
   |  
   | To prevent impacts to nesting hawks, work would not take place during the nesting season of March 1st to August 31st for redtail hawks and goshawks and April 1st through August 31st for Cooper’s and sharpshin hawks.

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

   | Explanation: None present in project area.

6. **Wetlands**

   | Explanation: None present in project area.

7. **Groundwater and Aquifers**

   | Explanation: No contact with groundwater. The proposed work is in an upland area; maximum depth of disturbance would be about 10 feet below ground surface.
8. **Land Use and Specially Designated Areas**

   **Explanation:** No change in land use and no specially designated areas identified.

9. **Visual Quality**

   **Explanation:** New wood poles would be similar to existing structures and would not be noticeably different than existing structures.

10. **Air Quality**

    **Explanation:** Any fugitive dust or similar during project implementation is expected to be temporary and minimal.

11. **Noise**

    **Explanation:** Construction noise would be temporary and localized.

12. **Human Health and Safety**

    **Explanation:** Project activities would not impact human health or 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.

- **☑** Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

- **☑** 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.

- **☑** 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.
**Landowner Notification, Involvement, or Coordination**

The BPA Project Manager has been in contact with the Forest Service throughout the planning phase and the Forest Service would be notified once the official start date has been determined.

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

Signed:  /s/ Fred Walasavage  
Fred Walasavage  
Environmental Protection Specialist  

Date:  June 12, 2018