Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

Proposed Action: Knight-Ostrander No. 1 Transmission Line Emergency Insulator Replacement Project

PP&A No.: 4228

Project Manager: Theresa Berry – TEPL-TPP-1

Location: Skamania County, Washington, and Multnomah and Clackamas counties, Oregon

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

Description of the Proposed Action: The Bonneville Power Administration (BPA) proposes an emergency replacement of insulators along the 500 kilovolt (kV) Knight-Ostrander No. 1 transmission line within BPA’s Longview and the Dallas districts. The Knight-Ostrander No. 1 Transmission Line Emergency Insulator Replacement Project would be necessary in order to replace failing insulators and certain pieces of associated failing hardware before they become a further hazard with a potential to cause a fire. The project would span approximately 22 miles from structure 60/1 to structure 82/3. The work would occur in three counties: Multnomah and Clackamas counties, Oregon and Skamania County, Washington. The project would cross through the Columbia River Gorge National Scenic Area, Mt Hood National Forest, Bull Run Watershed, Bureau of Land Management-managed lands, and private lands.

BPA determined that only specific insulators and hardware located along suspension towers are at imminent risk of structural failure or arcing and would require emergency replacement. To replace the insulators, linemen would access towers and disconnect the failing insulators and associated hardware. Helicopters would then take away the old insulators and bring in new ones. The project would utilize pickup trucks (equipped with a vehicle mounted pulley system), low ground pressure ATV, flatbed trucks, dump trucks, firefighting water truck/trailer, helicopters, and several helicopter landing zones. A small amount of brush clearing may be required for helicopter fly yards, otherwise, no ground disturbing activities are anticipated and existing access roads would be used whenever possible to minimize impacts. If boulders or other debris are present in the access roads, they may be relocated to the road shoulder to allow for vehicle access.

Due to the urgent nature of the project, BPA’s Bare Hand Crew would replace some of the insulators while the conductor is still energized. Once BPA is able to take an outage, BPA would have multiple crews conducting the work during the period when the line is de-energized. To facilitate the work in certain locations, BPA would transport some line workers via helicopter using Human External Cargo (HEC) to ferry linemen to towers that would be otherwise inaccessible via the existing access road system.

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.

/is/ Kevin George
Kevin George
Environmental Protection Specialist

Concur:

/is/ Katey Grange Date: August 8, 2019
Katey Grange
NEPA Compliance Office

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: Knight-Ostrander No. 1 Transmission Line Emergency Insulator Replacement Project

Project Site Description

The project is located in the western Oregon and Washington, predominantly within the Columbia River Gorge and the foothills of the northern Cascade Range. The project area is comprised of mainly forested lands and agricultural lands. See Table below, for Township, Range, Section Number, County, and Ownership information.

<table>
<thead>
<tr>
<th>Township, Range, Section</th>
<th>County, State</th>
<th>Ownership/Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>1N, 6E, Sections 23-27,32-34</td>
<td>Multnomah, OR</td>
<td>US Forest Service (USFS)</td>
</tr>
<tr>
<td>1N, 7E, Section 4,5,8,9,17,38,39,40</td>
<td>Multnomah, OR</td>
<td>USFS</td>
</tr>
<tr>
<td>2N, 7E, Section 21,28,38,42,46,47</td>
<td>Multnomah, OR</td>
<td>USFS</td>
</tr>
<tr>
<td>1S, 5E, Section 12-15, 21-23,28,29,32</td>
<td>Multnomah, Clackamas, OR</td>
<td>Private, Bureau of Land Management (BLM)</td>
</tr>
<tr>
<td>1S, 6E, Section 4-8</td>
<td>Multnomah, OR</td>
<td>USFS</td>
</tr>
<tr>
<td>2N, 7E, Section 16</td>
<td>Skamania, WA</td>
<td>Private</td>
</tr>
</tbody>
</table>

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</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>

**Explanation:** Following a review of the potential project impacts to cultural resources, BPA has determined that this undertaking will have No Adverse Effect to historic properties. The BPA Historian review has shown that, minor repair work will not adversely impact the integrity of historic transmission lines. The Knight-Ostrander line, originally part of the operating Wautoma-Ostrander line (design name Hanford-Ostrander), constructed in 1972 does fall within BPA’s period of significance and is considered eligible. The use of the helicopter landing zones associated with this project will also not adversely impact historic properties, as was assessed through a pedestrian survey and subsurface testing by a BPA contract archaeologist.

Between July 18th, 2019 and August 3, 2019, BPA contacted the following parties by phone: Oregon State Historic Preservation Office (SHPO), Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe and Mt. Hood National Forest. An initiation letter will also be sent out for record keeping purposes. Concurrence from SHPO was received on August 2019.

**Note:** The following minimization measures would be implemented.

- No work in vicinity of structure 60/4 is allowed as part of this project.
- Any necessary additional work sites such as landing zones would obtain Section 106 Concurrence prior to use.
### Note: The following minimization measures would be implemented.
- No work in vicinity of structure 60/4 is allowed as part of this project.
- Any necessary additional work sites, such as landing zones, would obtain Section 106 Concurrency prior to use.

| 2. **Geology and Soils** | ✓ |  
|--------------------------|---|---|
| **Explanation:** Minimal to no ground disturbance is anticipated. |

<table>
<thead>
<tr>
<th>3. <strong>Plants</strong> (including Federal/state special-status species and habitats)</th>
<th></th>
<th>✓</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Explanation:</strong> Minimal disturbance to vegetation is anticipated. Vegetation may be crushed in those locations where equipment would be accessing structures. There would be no effect to ESA-listed plant species. No impacts, to two state sensitive species categorized as “Critically Imperiled” or “Imperiled” potentially located near the project work areas, are anticipated.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In order to limit the spread of invasive terrestrial and aquatic plant species on National Forest System land managed by the Portland Water Bureau (PWB); BPA would comply with the Bull Run Watershed Management Unit Risk Assessment for Invasive Plant Species Standard Operating Procedure the and Bull Run Watershed and Sandy River Basin Risk Assessment for Aquatic Invasive Species (Aquatic SOP).

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).

### Note: 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
- Stabilize and seeded with a geographic and climate-appropriate seed mix approved by the landowner
- Utilize erosion and sediment control materials composed of certified weed free materials
- Implement fire control measures identified in the

<table>
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<tr>
<th>4. <strong>Wildlife</strong> (including Federal/state special-status species and habitats)</th>
<th></th>
<th>✓</th>
</tr>
</thead>
</table>
| **Explanation:** In general, the project would have minimal impacts to wildlife and habitat related to temporary disturbance associated with elevated noise and human presence. The project would have no impacts to state sensitive species categorized as “Critically Imperiled” or “Imperiled”.

The project would have no effect to ESA-listed species in Washington. In Oregon, the project would have a no effect to ESA-listed species with the exception of spotted owl. Several areas of the project occur within spotted owl Designated Critical Habitat and near historical nesting sites on the Mt Hood National Forest. Because the project timing would occur within spotted owl late nesting season from July 16th though September 30th, it has the potential to impact the species. BPA worked with the US Forest Service to determine that BPA's Knight-Ostrander Emergency Insulator Replacement Project activities fall within the determination of "may affect, not likely to adversely affect" for Power line maintenance and Aerial operations as described in the 2017 Biological Opinion for Routine Land Management Activities within the Willamette Planning Province of Oregon with the Potential to Disturb the Northern Spotted Owl.

### Note: The following minimization measures would be implemented to minimize impacts to wildlife and their habitat.
- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal
- Stabilize and seeded with a geographic and climate-appropriate seed mix approved by the landowner
- In accordance with the Biological Opinion, fly helicopters a minimum of 330 feet above designated Critical Habitat except for when they are working directly in the right-of-way, where there would be no minimum distance requirement.
5. **Water Bodies, Floodplains, and Fish**
   (including Federal/state special-status species, ESUs, and habitats)

   **Explanation:** No work in or near the Columbia River or other waterbodies occurring within the project area are anticipated for the project. No riparian vegetation would be impacted by the project. In addition, on National Forest System land managed by the PWB, BPA would comply with the *Bull Run Human Sewage Containment for Bull Run Water Supply Drainage Standard Operating Procedure* to further minimize impacts to water resources.

   **Note:** 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 from reaching any nearby waterbody.
   - Appropriately stocked spill response kits would be located on vehicles, other equipment, fly yards used on this project.
   - At the request of the PWB, no fueling would occur within the Bull Run Watershed.

6. **Wetlands**

   **Explanation:** No ground disturbing activities are anticipated in wetlands or other waterbodies that occur along the project. Erosion control measures would be implemented to prevent sedimentation.

7. **Groundwater and Aquifers**

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

   **Note:** 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**

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

   Because the planned activity in the Columbia River Gorge National Scenic Area would be in support of existing transmission facility operation and maintenance, the activity falls under the savings provision for BPA transmission facilities that is contained in the Columbia River Gorge National Scenic Area Act of 1986 (Act). As falling under the savings provision, the activity would be exempt from management plan consistency review under the Act.

   For those portions of the project crossing the Mt. Hood 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**

   **Explanation:** The project would have a minimal impact to visual quality. Existing glass and fiberglass insulators would be changed to brown glazed porcelain insulators, which is consistent with other insulators along the transmission line.
10. **Air Quality**

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

11. **Noise**

   **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**

   **Explanation:** No impacts to human, health, and safety are anticipated.

   On National Forest System land managed by the PWB; BPA would comply with the Bull Run Human Sewage Containment for Bull Run Water Supply Drainage Standard Operating Procedure.

   **Note:** The following minimization measures would be implemented.
   - At the request of the PWB, no fueling would occur within the Bull Run Watershed

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**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, if necessary:**

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

  **Explanation, if necessary:**

- ** ✓** 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, if necessary:**

- ** ✓** 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, if necessary:**

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**Landowner Notification, Involvement, or Coordination**

**Description:** BPA realty and environmental specialist have coordinated the proposed project activities with Columbia River Gorge National Scenic Area, Mt Hood National Forest, Bull Run Watershed, 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/ Kevin George
Kevin George, EPI-4
Environmental Protection Specialist

Date: August 8, 2019