

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** UEC Transmission Lines at Longhorn Substation

**Project No.:** LURR20240078

**Project Manager:** Matt Joerin, TEPP-TPP-1

**Location:** Morrow County, Oregon

**Categorical Exclusions Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Umatilla Electric Cooperative (UEC) to construct new line segments to 4 of their existing 230-kilovolt (kV) transmission lines on BPA fee-owned property at Longhorn and Morrow Flat substations. The new segments would provide a connection between the Longhorn Substation and UEC's Long Walk and Internet Parkway substations and HWY 730 Switchyard; and the Morrow Flat Substation and UEC's Internet Parkway Substation. UEC plans to build 17 new single steel-pole structures, seven H-frame steel structures, and four 3-pole steel structures. No guying or guy anchors would be required for any structures. Pier foundations with a diameter of 6-10 feet would be used for all structures. Once these new line segments are constructed, a 300-foot section of existing 230-kV conductor would be removed on UEC's BPA Morrow Flat - UEC 730 Switchyard. The structures would remain in-place.

Construction and conductor removal equipment would include typical line trucks, pickup trucks, a crane for structure installation and conductor removal, and a semi-trailer for structure delivery. UEC would use existing access roads and pathways across flat areas that were recently developed to construct the Longhorn Substation. Structure and conductor removal locations and pulling and tensioning sites for conductor installation would all fall within areas previously disturbed for the construction of Longhorn Substation.

**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.

*Nancy A. Wittpenn*

Nancy A. Wittpenn, ECT-4  
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:** UEC Transmission Lines at Longhorn Substation

## **Project Site Description**

The project site includes BPA fee-owned property at Morrow and Longhorn substations. The construction of Longhorn Substation was recently completed. The proposed action would occur within existing BPA property.

The recent presence and dominance of noise and human activity at the Longhorn Substation site has minimized the overall use of the area by wildlife and probably contributed to the outmigration of any wildlife that was on-site or in the general area. Very few signs of wildlife, such as coyote scat, deer sign, or other animal tracks were observed even before the Longhorn Substation construction began. All or most vegetation was removed or disturbed for the construction of Longhorn Substation and is now being reseeded. No wetlands are present at the project site. The surrounding area is primarily characterized by rural residential, agricultural, and industrial land use, interspersed with warehouses, aggregate mining, industrial areas, military operations areas, and multiple transmission line structures and corridors.

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

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

Potential for Significance: No with conditions

**Explanation:** On April 23, 2024, BPA initiated National Historic Preservation Act, Section 106 consultation with the following parties:

- Confederated Tribes and Bands of the Yakama Nation
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Nez Perce Tribe
- Oregon State Historic Preservation Office

BPA determined that the proposed undertaking would cause no adverse effect to historic properties (BPA CR Project No.: OR 2021 096; OR SHPO Case No.: 21-1600). The Oregon SHPO concurred with BPA's recommendation on May 24, 2024. No other comments were received.

**Notes:**

- Follow the Post-Review Discovery procedure in the unlikely event that cultural material is encountered during the implementation of the proposed project. BPA would require that work be halted in the vicinity of the finds to ensure integrity of site and materials until they can be inspected and assessed by BPA in consultation with the appropriate consulting parties. Contact the BPA environmental lead and/or the BPA archaeologist for further instruction.

## 2. Geology and Soils

Potential for Significance: No

Explanation: The proposed action would cause temporary soil disturbance, soil rutting, and soil compaction around each structure for footing installation, conductor removal, and at pulling/tensioning sites. These areas were also similarly affected during the construction of the substation in 2023 and before that, agricultural uses. In time, these disturbed soils would stabilize as vegetation is established through reseeding following project completion. Any excess soil from footing installation would be disposed of according to local, state, and federal regulations. Standard construction best management practices (BMPs) would minimize erosion, sedimentation, and fugitive dust.

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

Potential for Significance: No

Explanation: The proposed action would temporarily crush, strip, or clear weedy or other low-growing vegetation that may have been untouched during substation construction in 2023. Temporarily disturbed areas would be stabilized and reseeded following completion of the project. Standard construction BMPs would minimize the spread of noxious weeds. The proposed action would have no effect on special-status plant species or habitats.

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

Potential for Significance: No

Explanation: Wildlife surveys were conducted in May 2022 to identify potential special-status wildlife species and habitats, including Washington ground squirrel (*Urocyon washingtoni*) and burrowing owl (*Athene cunicularia*). A single long-billed curlew (*Numenius americanus*), which is listed by the Oregon Department of Fish and Wildlife as a state-sensitive species, was observed near the then proposed Longhorn Substation site. Long-billed curlew nest on the ground and may use the area for foraging and dispersal, but the degraded nature of the habitat makes it unlikely that a bird would nest in this area. In addition, a red-tailed hawk (*Buteo jamaicensis*) was observed on an existing transmission structure near the proposed substation location at the time. Construction noise is unlikely to disturb the presence of this nest given the recent substation construction and ongoing high level of agricultural, industrial, and commercial activity that is typical of the area. No other special-status species were observed during the 2022 field surveys. The proposed action would have no effect on special-status wildlife species or habitats.

The proposed action could impact wildlife through temporary construction noise, spread of noxious weeds, and increased risk of bird collisions with new conductor locations where previously there were none. While most wildlife species would likely be able to avoid construction areas and would only be temporarily disturbed by construction activities, some wildlife (primarily small burrowing mammals) could experience incidental mortality from ground disturbance and foundation installation. Incidental mortality would be low given the lack of suitable habitat and previous intensive substation construction and agricultural use at the project site.

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

Potential for Significance: No

Explanation: No riparian habitat, water bodies, floodplains or fish-bearing streams exist at or near the project site. The proposed action would not impact these features or habitats.

## **6. Wetlands**

Potential for Significance: No

Explanation: A wetland survey was completed in June 2022, and no wetlands or waters were identified within or near the project site or structure work areas. The proposed action would not impact wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Ground disturbance is unlikely to reach depths to groundwater, and no new wells or other uses of groundwater or aquifers are proposed. Standard construction BMPs would reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater or aquifers. The proposed action would not impact groundwater or aquifers.

## **8. Land Use and Specially-Designated Areas**

Potential for Significance: No

Explanation: The proposed action is an approved use by Morrow County. The structures would be added on BPA fee-owned land which is already consistent with utility use.

## **9. Visual Quality**

Potential for Significance: No

Explanation: A viewshed analysis was prepared in 2022 and provided to consulting parties as part of the Section 106 consultation process for the Longhorn Substation. During structure construction, the presence of construction equipment and general construction activities, including vegetation disturbance, would cause temporary visual impacts. Over the long-term though, the proposed action would cause an imperceptible change in the appearance of the project site and surrounding area. Transmission lines and structures already cross the area around the substations and the addition of similar structures to those already present would not be out of character with surrounding industrial and utility uses.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and emissions in the local area from general construction activities. Standard construction BMPs would suppress dust. There would be no long-term change in air quality following completion of the proposed action.

## 11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles, equipment and general construction activities could produce noise but levels would likely not be too much higher than current ambient levels directly around a substation and nearby transmission lines. Noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7 AM to 7 PM). There would be no long-term change in ambient noise following completion of the project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed throughout project construction, and standard construction BMPs would minimize risk to human health and safety. 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. No additional landowner notification, involvement, or coordination would be required.

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

Signed: *Nancy A. Wittpenn*  
Nancy A. Wittpenn, ECT-4  
Environmental Protection Specialist