Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Libby-Bonners Ferry No. 1 Impairments and Access Road Improvements

PP&A No.: P04256

Project Manager: Andrew Young – CSB - 2

Location: Boundary County, Idaho, and Lincoln County, Montana

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

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to remedy impairments, add overhead ground wire (OHGW), and improve access roads along the Libby-Bonners Ferry No. 1 transmission line in Boundary County, Idaho, and Lincoln County, Montana. The transmission lines are supported by wood pole structures. Impairments are locations along the transmission line where the distance between the ground surface and the energized conductor does not meet safety and reliability clearances. BPA proposes to address 13 impairments to the line with a variety of remedies, ranging from excavation of the ground under the impaired area of the line to restore adequate clearance, to replacing existing structures with taller wood poles to increase the distance between the line and the ground.

At those areas with planned wood pole replacements, during an electrical outage, BPA's transmission line maintenance crews of four to eight individuals would mobilize to the work sites in light duty trucks, utility line equipment, and heavy equipment such as a backhoe. The new pole holes would be excavated or drilled out using an auger, the poles would be placed in the holes, and holes would be backfilled. In areas that have large amounts of rock, the project may also require drilling to install poles and guy wires, with drilling anticipated to take 1 to 2 days. Transmission line hardware such as insulators and cross-bracing would be installed, and the conductor would be hung from the new structure. The old structure would then be demolished and removed from the site.

Some additional line work would also be completed to facilitate the addition of an overhead ground wire (OHGW) to the transmission line, which increases the overall safety and reliability of the line. See noted areas in Table 1. The OHGW protects the electrical grid from lightning strikes, provides ground fault protection, and helps prevent disruptions to the electrical system. For those sites with only hardware additions planned for OHGW, the structures would be accessed using aerial lifts and electrical line trucks. Work at each site would take 1 to 2 days.

For those areas with planned impairment excavation (Table 1), BPA would re-survey and flag the impaired area. All work and disturbance would occur within the existing transmission right-of-way, in upland locations away from waterways. BPA's civil contractors would mobilize to the site with heavy equipment such as an excavator, backhoe, and dump trucks, as well as light-duty trucks.

Crews would likely be made up of two to four individuals. Topsoil would be scraped and salvaged for future re-spreading during restoration. The impaired areas between 7/5 – 7/6, 20/1 – 20/2, 34/4 – 34/5, 35/3 – 35/2, and 56/3 – 56/4 would include a total of approximately 0.2 acres (8,710 square feet) of excavated material. Excavation areas range from approximately 433 to 4,360 square feet. Excess soil would be spread on-site to match existing contours or hauled away for off-site disposal. Reserved topsoil would be re-spread and stabilized with weed free straw and seeded with a native erosion control seed mix. Work at each impairment site would take approximately 2 to 4 days, depending upon the amount of material to be removed, and on-site spreading vs. haul away disposal.

BPA has proposed the construction of two retaining walls at structure 56/3 on the Libby-Bonners Ferry No. 1 transmission line to improve the landing size at the structure. One wall would be approximately 6 to 9 feet tall on the uphill (cut slope) side of the structure, while the other wall would be approximately 10 to 12 feet tall on the downhill (fill) side. The retaining walls are designed to expand the landing area around the structure, providing a safer and more efficient space for future maintenance of the transmission structure. Construction of the retaining walls is expected to take approximately one month.

In order to facilitate the impairment remedy work and pole replacements, BPA would improve access roads at specific locations in the project area. A summary of road work can be found in Table 2. BPA's access roads are generally 12 to 14 feet wide compacted two-track dirt roads or engineered gravel roads. Access road improvements consist of three tiers: improvements, reconstruction, and new road construction. Access road improvements consist of light blading of existing road surface, placement of rock, and compaction. Access road reconstruction consists of heavier blading of existing road surface to remove ruts and washouts, placement of rock, and compaction. Access road construction consists of blading a new access road footprint to establish the road prism, placement of rock, and compaction. In total, approximately 6.1 miles of access roads would be improved, and less than a mile total of access roads would be reconstructed and newly constructed. For this proposed action, all new road construction would occur within the existing BPA transmission right-of-way, which is managed to promote low-growing vegetation and maintain electrical safety clearances, or historically utilized road surfaces that have been previously disturbed. Following road work, stormwater drainage features such as drain dips, water bars and cross-drain culverts are added to improved access roads toward the end of the project to facilitate stormwater flow off the road surface. In general, depending upon the number of crews and trucks, location of the project and rock sources, etc., access road work can progress at approximately 1 to 3 miles per week of active work. Landings would also be reconstructed at existing transmission line structure sites. Landings are approximately 60 feet by 40 feet in dimensions and are designed to enable modern equipment such as electrical line trucks (including equipment with outriggers) to access the structure sites and perform maintenance.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Table 1. Project Plan

Transmission Line	Line Mile/ Str. Number	Lat./Long	Issue	Action
Libby-Bonners Ferry No. 1	7/5	Lat: 48.42913° N Lon: 115.42754° W	Span AOL impaired to ground.	Excavate approx. 93 cyd near 7/6 and use fill to build landing at 7/5. Replace structure 7/5 like for like.
Libby-Bonners Ferry No. 1	20/1	Lat: 48.44152° N Lon: 115.64383° W	Span AOL impaired to ground.	Add post insulator to structure to restrict insulator from swinging out.
Libby-Bonners Ferry No. 1	31/9	Lat: 48.44167° N Lon: 115.86953° W	Impaired to distribution crossing.	Retention the conductor.
Libby-Bonners Ferry No. 1	32/1	Lat: 48.44217° N Lon: 115.87094° W	Rebuild structure, does not have room for OHGW.	Add OHGW from Troy substation to structure 33/2. Rebuild structure with hardware because of OHGW.
Libby-Bonners Ferry No. 1	32/2	Lat: 48.44518° N Lon: 115.87118° W	Needs new OHGW.	Add OHGW from Troy substation to structure 33/2.
Libby-Bonners Ferry No. 1	32/3	Lat: 48.44588° N Lon: 115.87133° W	Existing structure does not have room for OHGW.	Add OHWG from Troy substation to structure 33/2. Rebuild structure with hardware because of OHGW.
Libby-Bonners Ferry No. 1	33/1	Lat: 48.44588° N Lon: 115.87133° W	Existing structure does not have room for OHGW.	Add OHWG from Troy substation to structure 33/2. Rebuild structure with hardware because of OHGW.
Libby-Bonners Ferry No. 1	33/1	Lat: 48.44588° N Lon: 115.87133° W	Existing structure does not have room for OHGW.	Road work and landings needed. See Table 2.
Libby-Bonners Ferry No. 1	33/2	Lat: 48.44588° N Lon: 115.87133° W	Existing structure does not have room for OHGW.	Add OHWG from Troy substation to structure 33/2. Rebuild structure with hardware because of OHGW.
Libby-Bonners Ferry No. 1	33/2	Lat: 48.44588° N Lon: 115.87133° W	Existing structure does not have room for OHGW.	Road work and landings needed. See Table 2.
Libby-Bonners Ferry No. 1	34/4	Lat: 48.45787° N Lon: 115.87245° W	Span AOL impaired to ground.	Excavate 173 cyd.
Libby-Bonners Ferry No. 1	35/2	Lat: 48.45787° N Lon: 115.87245° W	Span AOL impaired to ground.	Excavate 17 cyd.
Libby-Bonners Ferry No. 1	55/1	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Rebuild & raise structure 55/2 by 10 ft.
Libby-Bonners Ferry No. 1	55/2	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Road work and landings needed. See Table 2.
Libby-Bonners Ferry No. 1	55/4	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Rebuild & raise structures 55/4 by 5 ft and 55/5 by 5 ft.
Libby-Bonners Ferry No. 1	55/4 and 55/5	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Road work and landings needed at 55/4 and 55/5. See Table 2.
Libby-Bonners Ferry No. 1	56/3	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Rebuild & raise structure 56/4 by 10 ft (~80 ft poles) and replace 56/3 like for like.
Libby-Bonners Ferry No. 1	56/3 and 56/4	Lat: 48.69803° N Lon: 116.16286° W	Span AOL impaired to ground.	Road work and landings needed to 56/3 and 56/4. See Table 2.

*OHGW = overhead ground wire, AOL = ahead of line, BOL = back of line

Table 2. Access Road Work

Transmission Line	Line Mile	Improvements (linear ft.)	Reconstruction (linear ft.)	New Construction (linear ft.)
Libby-Bonners Ferry No. 1	6	9675	-	425
Libby-Bonners Ferry No. 1	7	8600	450	-
Libby-Bonners Ferry No. 1	32	450	-	-
Libby-Bonners Ferry No. 1	33	650	950	-
Libby-Bonners Ferry No. 1	34	4450	-	-
Libby-Bonners Ferry No. 1	35	1825	-	-
Libby-Bonners Ferry No. 1	55	3825	-	-
Libby-Bonners Ferry No. 1	57	2500	1825	325
Totals (linear feet)		31975	3225	750
Totals (miles)		6.1	0.6	0.1

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; 89 FR 34074, April 30, 2024), 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.[1]

/s/ *Brenna Blankenship*
Brenna Blankenship
Biological Scientist (Environmental)

/s/ *Katey C. Grange*
Katey C. Grange
NEPA Compliance Officer Date: *March 13, 2025*
Attachment(s): Environmental Checklist

[1] BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq*.

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: Libby-Bonners Ferry No.1 Impairments and Access Road Improvement Project

Project Site Description

The proposed project is located in northern Idaho and northwestern Montana, specifically within Boundary County, Idaho, and Lincoln County, Montana. The proposed action would occur within, and immediately adjacent to BPA's right-of-way (ROW) and access roads on the Libby – Bonners Ferry No. 1 transmission line.

The project area is located in the Columbia Mountains/Northern Rockies ecoregion in northern Idaho and northwestern Montana. The ecoregion is characterized by rugged mountains and intermontane valleys, with many of the same coniferous tree species present that comprise the forests west of the Cascade Mountains, including red cedar, western hemlock, and subalpine fir. The project is located on privately-owned land, as well as federal lands managed by the Bureau of Land Management (BLM). The land use surrounding the project area ranges from agricultural, private timber, rural residential, public conservation, and timber lands.

BPA does not own the property on which the transmission lines are located, but rather, has easement rights to operate and maintain the transmission lines and access roads. The cleared transmission corridors are approximately 200 ft. wide and the total length of the Libby – Bonners Ferry No. 1 transmission line is approximately 60 linear miles long. There are several access roads that would be used as direction of travel that cross U.S. Forest Service, Kootenai National Forest, and Montana Department of Transportation owned land. These portions of road would not require any improvement or work for use. Vegetation in the corridor is periodically managed to remove tall-growing tree species and promote low-growing grasses and shrubs. The topography ranges from relatively flat to hilly to mountainous in those areas near the Kootenai National Forest, typical of the Northern Rockies. Elevation in the proposed work locations generally ranges from 2100 – 3100 feet.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act, BPA evaluated the proposed project and developed an Area of Potential Effects (APE). On March 21, 2024, BPA initiated consultation on the proposed undertaking with the Confederated Salish and Kootenai Tribes, the Kootenai Tribe of Idaho, the Bureau of Land Management Coeur d'Alene District – Coeur d'Alene Field Office, the United States Forest Service (USFS), Kootenai National Forest, Montana Department of Transportation, the Montana State Historic Preservation Office (MT SHPO), and the Idaho State Historic Preservation Office (ID SHPO).

BPA conducted background research with Idaho and Montana state cultural resource databases, followed by an intensive field survey of the APE. Background research identified 47 previously recorded historic-era archaeological resources within one mile of the APE, four (two of which are for the same resource) of which are located to be within the APE in Montana. In Idaho 14 previously recorded historic-era archaeological resources were identified within one mile of the APE, one of which is located within the APE (Libby-Bonners Ferry No. 1 Transmission line). There are no known archeological resources that require avoidance. On November 8, 2024, BPA made a determination that the project would have no adverse effect to historic and cultural resources and received concurrence back from MT and ID SHPO.

Notes:

- In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA would require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Excavation and soil disturbance would be required to remedy impairments, replacement of wood pole structures, and the addition of any necessary guy wires and anchors, as well as to install the retaining wall at 56/3 and access road work. However, ground disturbance would be limited to the thirteen impairment locations and noted access roads. The project is located in an existing high-voltage transmission corridor, adjacent to existing transmission structures and access roads, in areas generally previously disturbed during the original construction of the transmission line. Maximum excavation depth would likely be approximately 10 to 15 feet. Upon project completion, the existing grade would be restored with native backfill, or imported backfill, and the disturbed soils would be seeded with a native erosion control seed mix and stabilized with straw or hydro-mulch. Excess soil would be spread on site and stabilized with seed and straw.

Notes:

- Work site footprints would be minimized as much as possible to avoid soil disturbance.
- Upon project completion, disturbed, un-rocked soils would be stabilized with native erosion control grass seed and mulched with straw, or hydroseeded.
- BLM provided site-specific measures for work occurring on their land would be implemented.

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

Potential for Significance: No with Conditions

Explanation: Local plants would be disturbed at areas requiring excavation to remedy impairments, during the replacement of structures, holes dug for necessary guy wires and anchors, retaining wall, blading for new and reconstructed road prisms. However, work footprint would be limited to the existing transmission right-of-way corridor and minimized as much as possible at the work site locations. Upon project completion, the area would be re-graded to match existing contours and seeded with a native seed mix.

In accordance with the Endangered Species Act (ESA), BPA obtained an official species list from the U.S. Fish and Wildlife Service (USFWS) on December 16, 2024. Pursuant to its responsibilities under Section 7 of the ESA, BPA evaluated the proposed project and developed an Action Area. No ESA-listed plants or habitat are present in the project area, therefore, the project would have "*No Effect*" on ESA-listed plant species.

BPA reviewed available data sources, and no special status state or BLM sensitive species are documented in the project area.

Notes:

- Work site footprints would be minimized as much as possible to avoid soil disturbance.
- Upon project completion, disturbed, un-rocked soils would be stabilized with native erosion control grass seed and mulched with straw, or hydroseeded.
- Clean vehicles and equipment by power washing prior to bringing vehicles and equipment to the project site. After cleaning, inspect vehicles and equipment to ensure that soil, mud, debris, seeds, and plant materials that may transport noxious weeds have been removed. Do not spread noxious weeds to areas with low noxious weed density through the transfer of soil, mud, debris, seeds, and plant materials on vehicles and equipment. Continue to clean vehicles and equipment as needed to ensure noxious weeds are not spread.
- BLM provided site-specific measures for work occurring on their land would be implemented.

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

Potential for Significance: No with Conditions

Explanation: Local wildlife, such as small to midsized mammals and birds, could be disturbed by project activities, assuming they are present in the project area. However, disturbance would be temporary, and the surrounding landscape provides ample habitat and cover for displaced animals.

In accordance with the ESA, BPA obtained an official species list from the USFWS on December 16, 2024. Concluding an initial review of habitat within the project area, and recorded ESA-listed species observations documented in Montana and Idaho's Natural Heritage Program databases, as well as other scientific database sources, BPA engaged in informal consultation with the USFWS on December 19, 2024, pursuant to its responsibilities under Section 7 of the ESA. BPA determined, and received concurrence on February 13, 2025, from USFWS, that the proposed project actions "*may affect, [*but is*] not likely to affect*" North American wolverine, grizzly bear, Canada lynx, and Canada lynx critical habitat. The proposed actions will have "*No Effect*" to yellow-billed cuckoo. The proposed action is "*not likely to jeopardize the continued existence*" of the proposed species Monarch butterfly.

BPA reviewed available data sources, and no special status state or BLM sensitive species would be impacted by the project activities.

Notes:

- To avoid disturbance to grizzly bears during the fall and denning season, scheduled activities would be conducted between March 16 and October 15 in the 57 to 56 mile of the Libby-Bonners Ferry No. 1 transmission line, which overlaps grizzly bear recovery zones, grizzly bear management units, and areas ≥1600 meters in elevation.
- BPA personnel and contractors would be required to properly store and dispose of materials that could attract grizzly bears to the Action Area per USFWS requirements.
- Overnight camping would not take place during the course of activities.
- BPA would report any sightings of ESA listed species to USFWS within 24 hours, or as quickly as practicable, and include date, time, location, photos, direction of travel, presence of a radio collar, and any other descriptive information that might be useful in identifying the bear.
- BPA personnel and contractors performing activities in the right-of-way and access roads away from their vehicles will be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.

- Construction activities would take place during daylight hours to minimize noise and disturbance during times when local species are more active; no night construction is permitted.

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

Potential for Significance: No with Conditions

Explanation: There are no water bodies, floodplain, or fish streams located in the project area. At structure 33/2, the transmission line crosses the Kootenai River. However, the river is over 400 feet from the structure location, and no proposed project activity or ground disturbance would encroach on the river, or impact fish, including ESA-listed bull trout, white sturgeon, or other aquatic life species. Pursuant to obligations under Section 7 BPA determined, that the proposed project actions would have "*No Effect*" to white sturgeon, bull trout, and bull trout critical habitat.

Notes:

- Locate refueling and servicing operations where spilled material cannot enter natural or manmade waterbodies and drainage conveyances (e.g., ditches, catch basins, ponds, wetlands, streams, and pipes). Use pumps, funnels, absorbent pads, and drip pans when fueling or servicing vehicles and equipment. Vehicle maintenance other than emergency repair may not be performed on site.
- The construction project would operate under a project specific erosion and sediment control plan (BPA ESCP plan or NPDES permit) to mitigate potential erosion and sedimentation into waterways and stabilize disturbed soils.
- During all sediment-generating activities, site-appropriate sediment transport minimization measures such as sediment curtains, fiber wattles, hay bales, sediment fences, or mulch will be fully functional prior to commencing work and maintained during sediment-generating activities to minimize unintentional erosion/sediment introduction into aquatic resources. Non-biodegradable materials, such as chicken wire, hog fencing, or plastic netting will not be used for soil stabilization.
- All excess excavated material would be disposed of at an upland (or offsite) location in a manner that precludes it from reentering resources that may affect listed species or their critical habitat.

6. Wetlands

Potential for Significance: No

Explanation: No wetlands are present in the project area

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No excavation would extend to depths that would impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The majority of the proposed project work sites are located on private lands; including open tracts near Bonners Ferry, Idaho, and privately owned forested lands. The primary land use is a high-voltage transmission corridor. The proposed project would not alter existing land use and is not located in a specially designated area. The land within the 57

to 56 mile of the proposed project is managed by the BLM, which is historically used for its timber resources and the project activities would not interfere with that land use.

9. Visual Quality

Potential for Significance: No

Explanation: The instillation of new wood pole structures and ground excavation to increase the ground to conductor clearance of the transmission line, as well as access road work, may change the existing visual character of the area. However, the area is currently a high voltage transmission corridor, and would remain so after project completion, so the overall appearance would not substantially change.

10. Air Quality

Potential for Significance: No

Explanation: Some minor, local impacts to air quality would occur due to construction activity and vehicular traffic, however impacts would be temporary and insignificant. Work areas are generally located in remote places, without human receptors.

11. Noise

Potential for Significance: No

Explanation: Construction activity would generate noise. However, impacts would be local and relatively minor. All project activity would occur during daylight hours, and work areas are generally located in remote places, without human receptors.

12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: The project would have benefits to human health and safety, as the purpose of the project is to restore safety and reliability clearance standards currently affected by the line impairments.

Project areas within line mile 7 out of Libby Substation are within the Libby Asbestos Superfund Site. The Libby CERCLA site is spread across a sizeable area and is divided into eight distinct Operable Units. The proposed activity is located in Operable Unit 3, which is the former Zonolite vermiculite mine and operated by W.R. Grace & Company. This area has been deemed not an immediate threat to human health and safety. The proposed work in these areas would be coordinated and permitted by the EPA and W. R. Grace & Company. BPA would follow all applicable health and safety measures defined to ensure human health and safety. The agreement ensures that activities are reviewed by the EPA Remedial Site Manager and can determine if the activities are protective of the site, the permit does not fall under an official CERCLA permit but is part of the ongoing processes at the site.

Notes:

- Prior to the start of the project, work crews would identify and discuss the job hazards and safety concerns and follow all BPA and OSHA safety procedures during construction.
- All construction activities would follow any permit requirements with respect to the Libby Asbestos Superfund Site

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: Project areas within line mile 7 out of Libby Substation are within the Libby Asbestos Superfund Site. BPA is engaging in quality assurance measures with the land managers and would implement the permit terms to not disturb hazardous contaminants. The agreement ensures that activities are reviewed by the EPA Remedial Site Manager and can determine if the activities are protective of the site, the permit does not fall under an official CERCLA permit but is part of the ongoing processes at the site.

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 will coordinate project activities with landowners and land managers at proposed work locations and will continue to coordinate during construction and site restoration. BPA has notified the BLM of the planned action and will continue to coordinate project activities on BLM lands during construction

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

Signed:/s/ *Brenna Blankenship* Date: *March 13, 2025*
Brenna Blankenship
Biological Scientist (Environmental)