

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Duckabush Switch Replacement Project

**Project No.:** P00695

**Project Manager:** Scott Lissit, TEPF-3

**Location:** Jefferson County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.6 Additions and modifications to transmission facilities

**Description of the Proposed Action:** BPA proposes to replace the B-825 switch (or, “Duckabush switch”), replace two associated transmission structures, and add one new transmission structure on the Shelton-Fairmount No.1 115kV line in Jefferson County, Washington. The project would improve the reliability of BPA transmission to Mason Public Utility District (PUD) No. 1 distribution lines in the vicinity of Duckabush Substation.

The work would begin in September 2023 with the disconnection and replacement of two transmission structures to the south of the Duckabush Substation that are located on either side of the Duckabush River: structure 36/8 (the eighth structure in the transmission line’s mile 36) is south of the Duckabush River, and 37/1 is north of the river and is currently co-located with the Duckabush switch. Structure 37/1 would be renumbered to 37/2 and a new 37/1 would be placed about 165 feet to the south. Replacement structures 36/8 and 37/2 would be in-kind to the original structures and installed within 10 feet of the original locations. Both transmission structures’ heights would increase by about 5 to 10 feet. The new 37/1 would be about 84 feet tall. The new switch would be located below the halfway mark of 37/2.

Minor clearing of vegetation around the existing structure landings at 36/8 and 37/2 may be done by crushing and scraping with motorized equipment. Landing areas would be improved with rock addition and minor alignment changes and expansion may be needed to support the project work and future maintenance. Anchors would be installed for new 37/2 stabilization and support, and concrete footers would be poured for the switch. The new 37/1 would be installed in an area inside the transmission corridor and between the paved Duckabush Road and the spur two-track road which would serve as the approach to new 37/1. A new landing area at 37/1 would be installed, and about 0.10 acre of existing scrub vegetation would be temporarily impacted, with about 0.06 acre of this being developed permanently as a graveled structure landing.

To allow for safe road crossings during work, temporary guard structures to prevent conductors from falling to the ground would be installed on either side of Duckabush Road, and another guard structure would be installed on the southern side of a two-track gravel spur road south of the new 37/1 location. The guard structures installation would require excavation and temporary vegetation removal. After installation of structure 37/2, the existing switch equipment and existing 37/1 would then be disconnected from the line and removed.

All work would occur within existing transmission rights of way. Two crews would simultaneously operate at separate locations in the project. Anticipated motorized equipment needed to accomplish the project would include, but not be limited to, line trucks, reel trailers, excavators, and pickup trucks. An aerial drone would be operated to cross the Duckabush River with conductors and groundwire.

After structure installation, all new conductor lines and overhead groundwire would be strung and connected to structures' hardware, and the temporary guard structures would be removed. Finally, during a scheduled line outage, the conductors would be connected to existing structures in the Duckabush Substation, and the switch connection would be completed.

**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/ Michael J. O'Connell  
Michael J. O'Connell  
Environmental Protection Specialist

Concur:

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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:** Duckabush Switch Replacement Project

## **Project Site Description**

The project's discrete work locations are adjacent to either side of the Duckabush River valley. Vegetation at the project sites is dominated by common open-grown scrub and herbaceous species with a mix of native and noxious and invasive non-native species. The Duckabush River supports Puget Sound populations of Federal Endangered Species Act (ESA)-listed threatened bull trout, Chinook salmon, chum salmon, coho salmon and steelhead, and is critical habitat for Hood Canal summer-run chum and Chinook. There is also critical habitat nearby for the ESA-listed threatened birds, marbled murrelet and Northern spotted owl, with Washington State designated Northern spotted owl management circles as near as 0.4 mile to the project's footprint. Underlying lands are owned by private entities, by BPA, and the Jefferson Land Trust. The Jefferson Land Trust administers the Duckabush Oxbow and Wetlands Preserve immediately adjacent to the new 37/1 structure location.

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

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

Potential for Significance: No with Conditions

Explanation: On May 3, 2023, BPA initiated consultation on the Duckabush Switch Replacement Project area of potential effect (APE) with The Jamestown S'Klallam Tribe, The Port Gamble S'Klallam Tribe, The Skokomish Indian Tribe, The Squaxin Island Tribe, The Suquamish Tribe, and the Washington Department of Historic Preservation (DAHP). DAHP concurred with BPA's definition of the Area on Potential Effect (APE) on May 4, 2023. No other responses to the initiation of consultation were received.

BPA surveyed the project area, which includes the historic built resources of the Shelton-Fairmount No. 1 transmission line and the Duckabush Substation, making the determination that the work would be in-kind repair work that would result in no adverse effect to historic properties. In response to BPA's determination letter of July 12, 2023, DAHP concurred on July 18, 2023, and provided terms of unanticipated discovery. The Squaxin Island Tribe responded to BPA's determination on July 21, 2023, indicating that the project location was outside of the tribe's area of interest and no further consultation was necessary.

The Jamestown Tribe responded to BPA's determination on August 2, 2023, with a request for further information. BPA forwarded the additional information to the Jamestown Tribe on August 9, 2023. Repeated attempts to follow up with the Jamestown Tribe were unsuccessful. The consultation period ended on August 12, 2023. No further comments were received.

Notes:

- Implement inadvertent discovery protocols in the unlikely event that cultural material is encountered during the implementation of this project. If any archaeological material is

encountered during project activities, the crew shall stop work in the vicinity and immediately notify the BPA environmental lead, archaeologist, and project manager, and the individual consulted parties for each site. The crew shall implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering and take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.

## 2. Geology and Soils

Potential for Significance: No

Explanation: All excavation for new transmission structures, the switch, and the temporary guard structures would be in or immediately adjacent to existing disturbed grounds of transmission structure locations or roadsides. All applicable best management practices (BMPs) typically employed by BPA in pole replacement operations would be applied to all excavation for the project. Loss of soil would be limited to minor wind or water transport, but amounts would not rise above inadvertent loss typical for pole and switch replacements. No geological features are anticipated to be affected because of the close proximity to existing in-ground features.

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

Potential for Significance: No with conditions

Explanation: There were no sensitive or special status plants, nor any noxious or undesirable plants found in the project area during a full vegetation survey performed over the course of two growing seasons (2021-2022). There were mapped occurrences of tansy ragwort within about 1.5 miles of the Project. Except for the new 37/1 structure location, the areas to be cleared of vegetation are around existing landings and surrounding transmission structures. About 0.2 acres would be cleared of vegetation for all work areas, with not more than 0.10 acre being converted to graveled landing area. The temporarily cleared portions of the work sites would be restored with application of an appropriate seed mix. All portions of the right-of-way undergo cyclic vegetation management through chemical and manual methods targeting tall growing species. The clearing required for the Project would not have a measurable effect on populations of native plants and would be unlikely to affect sensitive species based upon the recently documented absence of these in the full corridor.

### Notes:

- Wash vehicles with high pressure including undercarriages before arriving to work locations, and returning to work locations from vegetated offsite locations to reduce the potential for noxious plant spread
- Seed areas that have had vegetation removed with a BPA-approved native seed mix

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

Potential for Significance: No

Explanation: The timing of the work would negate effects to breeding birds of concern as well as ESA-listed marbled murrelet and Northern spotted owl that are known to occur in the vicinity. The breeding seasons for marbled murrelet and Northern spotted owl end on September 23 and September 30, respectively. While work would begin five days prior to the end of Northern spotted owl breeding season, USFWS agreed via informal coordination on August 24, 2023, with the BPA determination of No Effect to Northern spotted owl. No other ESA-listed terrestrial species would be affected by the work due to lack of typical habitat.

The area surrounding the project is designated wintering elk habitat (Washington State Priority Habitat), though because the work would be completed in the early fall, and all replacements would be in-kind, there would be no effects to wintering elk. No other state-protected or general wildlife would be expected to be affected by the project. The work areas are in cyclically maintained vegetated corridors that are subject to removal of tall-growing tree species via manual and chemical treatments and are near public access rights-of-way. These features reduce the overall quality of general wildlife habitat, and the project would only temporarily increase disturbances. Wildlife would avoid the work and return to any previous usage of the areas after the project is completed.

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

Potential for Significance: No

Explanation: The work at 36/8, south of Duckabush River would be about 488 feet from the ordinary high water mark (OHWM) of the Duckabush River, and the work on the new 37/1 structure to the north of the river would be about 700 feet from the river. All potential incidental erosion would be contained by BMPs installed within project boundaries. There would be no effects on water bodies or floodplains.

## **6. Wetlands**

Potential for Significance: No

Explanation: The transmission corridor containing the project was surveyed for wetlands and stream crossings in 2021 and 2022. No wetlands occur in the project's footprint.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: The replacement structures would be placed near the existing structures. Neither groundwater tables nor aquifers are known to be affected by the current structures, and there would therefore be no anticipated effects. If a water table is encountered, applicable BMP's would be employed to prevent contamination of water.

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

Potential for Significance: No with conditions

Explanation: The project is on privately owned lands over which BPA holds easements to perform maintenance efforts such as those proposed for this project. The work would not conflict with the designation of the wider area as wintering elk habitat by Washington Department of Fish and Wildlife due to work timing. Operation of, and visitor usage of, the Jefferson Land Trust's Duckabush Oxbow and Wetlands Preserve (the "Preserve") may be temporarily affected by the project. Construction would be immediately adjacent to the Preserve's small gravel parking lot; however, BPA would provide for safe movement of visitors and Preserve personnel for the two to three days of work here.

Notes:

- Install all necessary signage and traffic control to allow Preserve visitation or maintenance to proceed, or cooperate with Preserve personnel to temporarily close areas near work that cannot be made safe

## **9. Visual Quality**

Potential for Significance: No

Explanation: One new structure would be installed, and two replacement structures would be in-kind to the existing structures, though there would be increases in maximum heights. These changes to the right-of-way would be consistent with the overall visual appearance of the area and would not be apparent to the casual observer and would not change the quality of views from the river for those well-acquainted with the area.

## 10. Air Quality

Potential for Significance: No

Explanation: There would be only short-lived increases in vehicle exhaust in the work vicinity, and the air would return to its standard quality soon after the conclusion of equipment operation.

## 11. Noise

Potential for Significance: No

Explanation: Construction would create localized loud noise during active construction; however, work would be performed during daylight hours only, except for an instance of midnight outage work at the Duckabush Substation. There are several homes dispersed around the substation that are as close as 245 feet away. Metal-on-metal banging and some motorized equipment noise would be produced. While the noise could affect neighbors in the vicinity, it would be intermittent during a single six-hour work window. Midnight work efforts at the substation – with at least one in the last month – have not elicited complaints; therefore, minimal effects are anticipated from the noise.

## 12. Human Health and Safety

Potential for Significance: No with conditions

Explanation: All work would be performed by BPA line crews. BPA crews are trained in all potential hazard awareness and avoidance, using typical as well as uniquely conservative safety precautions to maintain some of the industry's highest safety standards. Work would occur near public rights-of-way and BPA would implement all applicable precautions.

The potential health and safety concerns tied to a midnight outage at Duckabush Substation would be minimized through ample notice to its potentially affected customers. On September 15, 2023, the PUD placed a notice on their website and social media regarding the outage details, and PUD would reach out again via telephone prior to the October 12 outage.

### Notes:

- Install all necessary signage and traffic control to allow safe public movement around work areas in accordance with local traffic laws

## **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 Project would take place on private property over which BPA holds easements, as well as on BPA fee-owned tracts. The easements BPA holds confer rights to maintain equipment, which would include the project's scope, and BPA has mailed notification letters regarding the project plan with respect to their land parcels. BPA is coordinating with Mason PUD-1 on the midnight outage so the PUD can mitigate effects to its customers. Mason PUD-1 has updated their social media and webpage with project outage specifics and will auto-call affected customers nearer to the scheduled work.

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

Signed: /s/ Michael J. O'Connell

Michael J. O'Connell  
Environmental Protection Specialist

September 18, 2023

Date