

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Whatcom PUD Transmission Operator (TOP) Fiber Installation Project

**Project Manager:** C. Kimmel, TEPF-CSB

**Location:** Whatcom County, WA

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.7 Fiber optic cable

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to add fiber optic cable (fiber) to existing transmission structures to provide a communication connection between Whatcom County Public Utility District's (PUD) transmission system and BPA's transmission system in Whatcom County, Washington. The addition of the fiber would allow BPA to serve as the transmission operator (TOP) for the Whatcom PUD.

Specifically, BPA would construct a new 50-foot by 50-foot landing at BPA Structure 1/2 of the Custer-Intalco No. 2 transmission line and attach the fiber from the Whatcom PUD transmission system in a new fiber splice case and enclosure on BPA Structure 1/2. The fiber would then be manually carried via bucket truck to attach to Structure 1/1. Once the fiber is at Structure 1/1, the fiber would be attached to the transmission structure leg and placed in an existing fiber vault. The fiber would then be buried for about 330 feet via two, 4-inch-diameter conduits into Custer Substation.

No additional ground disturbance beyond the conduit and landing installation is proposed. Fiber stringing activities, including staging and pulling, would occur within the existing transmission line right-of-way and substation.

Between Structures 1/2 and 1/1, a non-BPA utility line and a waterbody, California Creek, crosses the subject BPA right-of-way perpendicularly in two locations. As BPA is stringing the fiber between the existing BPA structures, the fiber would need to be placed over the non-BPA transmission line and waterbody. To do this, bucket trucks would be staged on each side of the features to 'hand' over the fiber.

One to two rubber-tired vehicles (bucket trucks) would access the area as they string the fiber between structures. Work would occur over a period of less than a week and would occur during the spring/summer of 2019.

**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/ Katey Grange

Katey Grange  
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

Date: April 24, 2019

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:** Whatcom PUD Transmission Operator (TOP) Fiber Installation Project

## Project Site Description

The proposed project would be located within the existing right-of-way for a 230-kilovolt (kV) steel lattice transmission line (Custer-Intalco No 2). The Custer-Intalco No. 2 line is directly adjacent to the Custer-Intalco No. 1 right-of-way and an existing BPA substation (Custer Substation). A non-BPA owned substation owned by Puget Sound Energy (PSE) is located in the immediate vicinity. Properties adjacent to the existing right-of-way are agricultural fields used for livestock grazing and rural residential.

The northern portion of the project area includes an upland terrace that includes an existing fill pad that was added during the initial buildout of the Custer Substation. The berm steadily slopes into a scrub-shrub and emergent wetland surrounding both sides of California Creek, which encompasses the majority of the project area. The southwestern portion of the project area includes a second fill berm upon which Vista Drive is built.

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Based on a cultural resources survey of the APE, BPA determined that the project would have no adverse effect on cultural or historic resources. BPA initiated Area of Potential Effect (APE) consultation with the Lummi Nation, the Swinomish Indian Tribal Community, the Nooksack Indian Tribe, and the Washington Department of Archaeology and Historic Preservation (DAHP) on August 16, 2018. DAHP concurred with the APE via a letter on the same date, and the Swinomish Indian Tribal Community responded via email on August 28, 2018. The BPA no adverse effect determination was submitted to the consulting parties on November 1, 2018. DAHP concurred on the same day, and the Swinomish Indian Tribal Community responded via email on November 12, 2018. No additional tribal response was received within 30 days.</p>		
2. <b>Geology and Soils</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><u>Explanation:</u> Soils would be temporarily disturbed by the excavation for conduit installation and the landing. The use of wetland matting along routes of travel with saturated soils would limit rutting and disturbance to wetland soils.</p> <p><u>Note:</u> Wetland matting less than 12 feet in width would be used in saturated soils to limit soil rutting. Matting would be removed from the site as soon as practical after fiber installation.</p>		
3. <b>Plants</b> (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> Herbaceous and shrub vegetation would be cut or crushed by vehicles driving along routes of travel either with (in saturated soils) or without (in dry soils) matting. Herbaceous vegetation would be disturbed in the conduit trenching and landing. No sensitive or ESA-listed plants were identified within the project area.</p>		

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



Explanation: Wildlife may be temporarily disturbed by noise generated by construction equipment and increased human presence during construction. No sensitive or ESA-listed terrestrial wildlife or habitats were identified within the project area.

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



Explanation: California Creek, a perennial waterbody, crosses the subject right-of-way for about 125 feet. Instead of crossing California Creek with vehicles, bucket trucks would be staged on each side of the waterbody and the fiber would be 'handed' from bucket to bucket. No instream disturbance would occur. Some individual shrub plants may be crushed or cut within the riparian areas, but no trees would be cut. While ESA-listed species are present in California Creek during some times of the year, due to the summer work timing and the lack of instream disturbance, there would be no effect on ESA-listed fish species.

Note: Riparian shrub disturbance would be limited to the minimum width necessary to complete the work.

6. **Wetlands**



Explanation: About 1,085 feet of emergent and scrub-shrub wetlands were delineated along the project right-of-way. If soils are saturated during installation and there is potential for soil rutting, wetland matting would be placed on the route of travel to minimize disturbance. No excavation is proposed in the delineated wetland and ground disturbance would occur more than 50 feet from the wetland.

In December of 2018, BPA submitted a Joint Permit Application (JARPA) to the US Army Corps of Engineers to authorize the temporary use of matting within the wetland for the project's route of travel. In the letter dated December 18, 2018, the US Army Corps of Engineers determined that no Clean Water Act Section 404 permit would be needed because the temporary use of the matting would have a 'de minimis' impact on wetlands. The State of Washington indicated that a Section 401 Certification would not be needed if the Section 404 permit is not required.

Note: Rubber tired vehicles (bucket trucks) would be used to minimize potential for wetland soil and vegetation disturbance. Matting would be used in saturated wetland soils and the mats would be less than 12 feet in width.

7. **Groundwater and Aquifers**



Explanation: No new wells or groundwater use is proposed. Trenching for the conduit would not be of sufficient depth to intersect the groundwater.

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



Explanation: No specially-designated land uses are present in the area. The project activities would be consistent and compatible with land uses within and adjacent to the project area.

9. **Visual Quality**



Explanation: The installation of the fiber would be consistent with the current transmission line appearance.

10. **Air Quality**



Explanation: A small amount of dust and vehicle emissions would occur during construction.

11. **Noise**



Explanation: A temporary increase in noise would occur during construction.

12. **Human Health and Safety**



Explanation: Regular construction safety measures would be implemented.

**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 has coordinated with the underlying landowners and will notify landowners of construction schedule.

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

Signed: /s/ Katey Grange  
Katey Grange, ECT-4  
Environmental Protection Specialist

Date: April 24, 2019