

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** N. Bonneville-Midway No. 1 Emergency Insulator Replacements; Towers 34/6, 80/2, 82/1 and 87/1

**PP&A No.:** 4,659

**Project Manager:** Todd Wehner, TEPL-TPP-1

**Location:** Klickitat, WA and Yakima, WA

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine Maintenance; B4.6 Additions and modifications to transmission facilities

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to replace insulators on four structures on the 230-kV N. Bonneville-Midway No. 1 transmission line. BPA owns and operates the 230 kV N. Bonneville – Midway No. 1 high voltage transmission line, which runs from N. Bonneville Substation in Skamania County, WA, to Midway Substation in Benton County, WA. BPA has identified several structures on the transmission line where the aged electrical conductor insulators pose an immediate safety and fire hazard risk and need to be replaced. Specifically, BPA proposes to replace the insulators at structures 34/6, 80/2, 82/1, and 87/1.

Due to the urgent nature of the project and lack of suitable access roads and landings at the structure sites to mobilize heavy equipment, BPA proposes to utilize human external cargo (HEC) to access the structure sites and replace the insulators. Helicopters would transport personnel and equipment to the structure locations, eliminating the need for access road and landing improvements at the work sites. Helicopter landing zones and material yards would be established in previously-disturbed locations near the transmission line. No ground disturbance would be required to complete the work. Equipment would include helicopters, light duty trucks, and standard transmission line maintenance tools and hardware. Work would be completed in July, 2021.

**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/ Aaron Siemers*

Aaron Siemers, EPR-4  
Environmental Protection Specialist

Concur:

*/s/ Katey Grange*

Katey C. Grange  
NEPA Compliance Officer

Date: July 9, 2021

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:** N. Bonneville-Midway No. 1 Emergency Insulator Replacements; Towers 34/6, 80/2, 82/1 and 87/1

### **Project Site Description**

The project is located in two geographically separate areas. Structures 80/2, 82/1 and 87/1 are located on the Yakama Indian Reservation. Structure 34/6 is located on lands managed by the State of Washington. Both locations are remote, generally uninhabited rural locations. Structure 34/6 is located in the Oak/Conifer Eastern Cascades Columbia Foothills ecoregion, a diverse ecoregion of varied soil types, climates and landforms. Dominant vegetation includes oak woodlands, grasslands, Douglas-fir and ponderosa pine forests, as well as Douglas-fir and western hemlock forests. At structure 34/6 the cleared transmission easement is approximately 300 ft. wide. The transmission line is supported by steel lattice structures. Vegetation is managed in the corridor to promote low-growing grass, shrub and forb species. A BPA gravel and dirt access road system runs through the right-of-way (ROW). The surrounding landscape is primarily Douglas fir and western hemlock forest, and shows indications of historic and more recent timber harvest.

Structures 80/2, 82/1 and 87/1 are located in the Yakama Plateau & Slopes and the Yakama Folds ecoregion, approximately 45 line miles northeast of the 34/6 proposed work location. The Yakama Plateau & Slopes ecoregion is at approximately 2,500 – 5,000 ft. elevation, with plateau, buttes and canyon topography, and ponderosa pine, bitterbrush, and some Douglas fir and Oregon white oak vegetation. The Yakama Folds ecoregion is generally grassland, with trees only located near intermittent and perennial waterways. Topography is generally milder than the other project areas. Vegetation consists of sagebrush, native grasses, and non-native cheat grass. Near the proposed work sites, the transmission line runs along Highway 97, which is located west of the ROW, approximately 300 – 1000 ft. from the line. Satus Creek, which provides habitat to endangered steelhead, is also present near the highway and the transmission line. The BPA access road system traverses the transmission ROW and consists of dirt two-track and gravel roads.

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

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

Potential for Significance: No with Conditions

#### **Explanation:**

On June 9<sup>th</sup>, 2021, BPA engaged in consultation with the Confederated Tribes and Bands of the Yakama Nation and the WA Dept. of Archaeology & Historic Preservation for the portions of the project outside the exterior boundaries of the Yakama Reservation (i.e. structure 34/6), and with the Tribal Historic Preservation Officer of the Confederated Tribes and Bands of the Yakama Nation for portions of this project inside the exterior boundaries of the Yakama Reservation (i.e. structures 80/2, 82/1 and 87/1). BPA informed consulting parties that BPA considered this project to be an emergency under 36 CFR 800.12(b)(2).

An Area of Potential Effect was identified, and the scope of the emergency insulator replacement work was detailed within the consultation documents, which at the time also included road improvements to enable safe access to the transmission structures to complete the work. On June 17<sup>th</sup>, 2021, BPA's agency official formally declared the insulator replacement work within the exterior boundaries of the Yakama Reservation an emergency under 36 CFR 800.12(b), and notified the Yakama Nation Tribal Historic Preservation Officer and the Advisory Council on Historic Preservation of the emergency declaration.

After further consultation with the Yakama Nation in the week of June 21<sup>st</sup>, in a letter dated July 2<sup>nd</sup>, 2021 BPA proposed an alternate work method of insulator replacement for structures 80/2, 82/1 and 87/1, involving the use of human external cargo (HEC); helicopter transport of equipment and personnel to the tower sites where work is planned. Using HEC, no ground disturbance would be required to complete the work, which would allow the emergency insulator replacements to proceed without risk of adverse effects to cultural resources.

On June 25, BPA informed the Confederated Tribes and Bands of the Yakama Nation and the WA Department of Archaeology and Historic Preservation that the work outside the exterior boundaries of the Yakama Reservation (i.e. structure 34/6) could be carried out without the use of heavy equipment using HEC, and BPA had changed its determination for this off reservation work to no potential to cause effects pursuant to 36 CFR 800.3(a)(1).

Notes:

- No ground disturbance would be authorized. No ground vehicular access to structures located on the Yakama Indian Reservation would be authorized.

## **2. Geology and Soils**

Potential for Significance: No

Explanation:

No ground disturbance would be required to complete the project. Fly yards/helicopter landing zone would be established on generally flat, previously-disturbed areas which would not require grading.

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

Potential for Significance: No

Explanation:

Some common native and non-native plants at fly yards/helicopter landing zones may be temporarily impacted. Disturbance would be surficial and these plants would be expected to recover naturally through propagation and via the existing seed bank in the area.

No special-status plants or Endangered Species Act (ESA)-listed plants would be impacted from project activities. Under Section 7 of the ESA, BPA obtained an official species list from U.S. Fish and Wildlife Service (USFWS) on July 7<sup>th</sup>, 2021. No ESA-listed plant species are present in the project area.

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

Potential for Significance: No

Explanation:

BPA obtained an official species list from the USFWS on July 7<sup>th</sup>, 2021. Due to the lack suitable habitat and presence in the project area, BPA has determined that the project

would have “no effect” on northern spotted owl, yellow-billed cuckoo and bull trout, as well as gray wolf (proposed endangered). No other special-status wildlife would be impacted by project activities.

Some temporary disturbance to local wildlife would occur due to project activities, including helicopter operations. However, disturbance would be temporary and the surrounding landscape provides ample habitat for avoidance.

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

Potential for Significance: No

Explanation: No in-water work or ground disturbance near waterways is proposed.

## **6. Wetlands**

Potential for Significance: No

Explanation: No work in or near wetlands is proposed.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No excavation or work that would potentially impact groundwater and aquifers is proposed.

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

Potential for Significance: No with Conditions

Explanation: The work location at structure 34/6 is located in the Columbia Gorge National Scenic Area (CRGNSA), which is managed by the U.S. Forest Service. BPA notified the USFS CRGNSA office of the emergency insulator replacement during a meeting in May of 2021. Insulator replacements fall under standard maintenance actions exempted by the BPA Savings Provision of the Columbia Gorge National Scenic Area Act.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The proposed project would not alter existing visual quality. The insulator replacements would not substantially alter the existing visual profile of the transmission line corridor.

## **10. Air Quality**

Potential for Significance: No with Conditions

Explanation: Helicopter operations have the potential to temporarily impact air quality primarily due to the generation of dust.

Notes:

- BPA and BPA's contractor would implement a fugitive dust control plan during project activities to minimize dust generation and migration.

## 11. Noise

Potential for Significance: No

Explanation: Helicopter operations would temporarily generate noise, primarily at fly yards and at work locations. Work sites are located in remote, sparsely populated areas, so impacts to humans would be limited.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: HEC operations pose unique safety risks due to the transport of linemen via a line and harness system. HEC is only performed by highly trained linemen and helicopter services companies.

Wildfires have the potential to severely impact human health and safety. The emergency insulator project is intended to reduce the risk of wildfire in BPA's service area.

Notes:

- The project would implement a Safety Plan that included HEC safety best practices. Work would be completed by experienced and highly-trained professionals. Crews would mobilize to work sites and landing zones with appropriate safety equipment, such as a water tank, fire extinguishers, and AEDs.

### 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: BPA would continue to coordinate the emergency insulator replacement project with the Yakama Tribe, land managers and other stakeholders.

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

Signed: /s/ Aaron Siemers

Aaron Siemers, EPR-4

Environmental Protection Specialist

Date: July 9, 2021