**Proposed Action:** Cowlitz PUD Pole Removal Project

**Project No.:** LURR 20220087

**Project Manager:** Charlene Belt, TERR-ROSS MHQA

**Location:** Cowlitz County, Washington

**Categorical Exclusion 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 the Cowlitz Public Utility District (PUD) to remove poles from BPA fee-owned land outside Longview Substation.

Cowlitz PUD is planning to remove two wooden H-frame transmission line structures and 69kV conductor from Cowlitz PUD’s abandoned Longview to Mt. Solo transmission line. To support this action, BPA proposes to allow Cowlitz PUD to use an existing road for access and to remove poles and conductor. The conductor would be dropped to the ground and wound. The poles would be removed using a track-mounted boom truck and hand shovels. Poles would be loosened from their holes and pulled out of the ground. No additional excavation would occur. The holes left behind would be filled with 5/8-inch minus aggregate.

**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/ Laura Roberts  
Laura Roberts  
Environmental Protection Specialist
Concur:

/s/ Sarah T. Biegel       June 15, 2022
Sarah T. Biegel          Date
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:** Cowlitz PUD Pole Removal Project

**Project Site Description**

The requested Cowlitz PUD’s pole removal project would occur on BPA fee-owned land near BPA’s Longview Substation, in Cowlitz County, Washington. The project is located in Township 8N, Range 2W, and Section 31. Cowlitz PUD’s project area is located in an existing transmission line corridor that contains several transmission lines and a substation. The area consists of low-growing native and non-native grasses and shrubs. The proposed project area occurs within a wetland.

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**
   
   Potential for Significance: No
   
   **Explanation:** BPA archaeologist completed background research for the Area of Potential Effect (APE) and determined the project actions would result in No Historic Properties Affected. Background research indicated that 15 previous archaeological surveys were conducted within one mile of the APE, one of which was conducted within the APE itself. Additionally, nine previously recorded cultural resources were noted within one mile of the APE, none of which were within the APE itself. BPA surveyed just north of the APE in 2021 and noted that the entire area and the APE is a seasonal wetland with extremely dense vegetation. In addition, no new ground disturbance would occur as a result of the project, as the existing poles would be removed from their current locations.

   BPA sent consultation documents on March 22, 2022, to the Washington Department of Historic Preservation (DAHP), the Cowlitz Indian Tribe, and the Confederated Tribes of Grand Ronde. BPA received concurrence with the APE and the project determination from DAHP on March 23, 2022, and April 27, 2022. No responses from the Cowlitz Indian Tribe or the Confederated Tribes of Grand Ronde were received.

   Should any cultural resources be discovered during the project activities, then all project work must stop and the Environmental Protection Specialist should be notified immediately. No additional review under Section 106 of the National Historic Preservation Act is required for this action at this time.

2. **Geology and Soils**
   
   Potential for Significance: No
   
   **Explanation:** Minor impacts to soils are anticipated from Cowlitz PUD’s pole removal project. Best management practices would be implemented during construction and following construction. Disturbed areas would be stabilized and seeded.
3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation: There are no Federal/state special-status plant species, or habitats present within the project area. Minor impacts to existing upland and wetland vegetation would occur resulting from Cowlitz PUD’s pole removal project. Disturbed areas would be stabilized and seeded following construction, with wetland areas seeded with a site-specific wetland seed mix.

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

Potential for Significance: No with Conditions

Explanation: In general, Cowlitz PUD’s pole removal project would have short-term noise and disturbance impacts to local wildlife related to elevated equipment noise and human presence, but any disturbed wildlife would temporarily disperse to adjacent habitat during the temporary disturbance. No Federal Endangered Species Act-listed wildlife occur within the vicinity of the project area.

A previously occupied avian nesting platform occurs in the general vicinity of the proposed project. To prevent impacts to Migratory Bird Treaty Act species, Cowlitz PUD would comply with listed-bird nesting timing restrictions, unless the nest platform is determined to be inactive or that nestlings have fledged.

Notes:
- No work can occur from March 1st to August 1st, unless nesting platform is determined to be inactive or nestlings are determined to have fledged.

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

Potential for Significance: No

Explanation: Water bodies, floodplains, or fish, would not be impacted directly or via erosion by Cowlitz PUD’s pole removal project.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: The general area southeast of the Longview Substation, where the proposed project is located, is a wetland. Cowlitz PUD has obtained a Section 404 of the Clean Water Act permit authorization (NWS-2021-1170, June 8, 2022) for permanent fill to wetlands of 0.0009 acre and temporary impacts resulting from Cowlitz PUD’s pole removal project.

Notes:
- Cowlitz PUD would implement all Nationwide Permit 18 Terms and Conditions stipulated under the permit authorization.
- Disturbed wetland areas would be seeded with a site-specific wetland seed mix.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Cowlitz PUD’s pole removal project would have no impact to groundwater or aquifers.
8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: There would be no change in the general land use or specially-designated areas as a result of Cowlitz PUD’s pole removal project.

9. Visual Quality

Potential for Significance: No

Explanation: There would be a minimal change to visual quality as a result of Cowlitz PUD’s pole removal project that would be consistent with the general surroundings of the existing transmission line corridor.

10. Air Quality

Potential for Significance: No

Explanation: A small amount of vehicle emissions and dust may occur temporarily during Cowlitz PUD’s pole removal project.

11. Noise

Potential for Significance: No

Explanation: Temporary increases in noise may occur during daylight hours as a result of Cowlitz PUD’s pole removal project. No ongoing noise increase is expected for this area as a result of this project.

12. Human Health and Safety

Potential for Significance: No

Explanation: No impacts to human health and safety are anticipated to result from Cowlitz PUD’s pole removal project.

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 Realty is in coordination with Cowlitz PUD, the applicant.

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

Signed: /s/ Laura Roberts  
Laura Roberts, ECT-4  
Environmental Protection Specialist  
June 15, 2022