

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Olympia District, Olympia TLM, 2022 Priority Wood Pole Replacements

PP&A No.: 4824

Project Manager: Rusty Ludt IV - TEPL-TPP-1

Location: Clallam, Mason, and Thurston Counties, WA

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) is proposing to replace deteriorating wood pole structures and any associated hardware and guys at specific locations in BPA's Olympia TLM Maintenance District. For all structures, the work would include removing the existing wood pole structures (and guy wires if present) and replacing them with in-kind in the same location.

Where needed, the project also includes improvements to existing access roads and landings associated with the transmission line rights-of-way that currently may inhibit access at the specified locations for routine maintenance. Dependent on the structure location and access road conditions, the project may include surface improvements of existing road surfaces and landings (blading and rocking) as well as improvements and in-kind replacements of existing drainage features.

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/ Greg Tippetts

Greg Tippetts, EPR-Olympia
Physical Scientist - Environmental

Concur:

/s/ Sarah Biegel

Sarah Biegel Date: June 17, 2022
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: Olympia District, Olympia TLM, 2022 Priority Wood Pole Replacements.

Project Site Descriptions

All structure replacement projects would be at specific locations in Clallam, Mason, and Thurston counties WA, in BPA's Olympia TLM Maintenance District. All work would be done in existing managed rights-of-way that cross Washington State Department of Natural Resources (DNR), USFS, private timber, and private rural residential and agricultural lands. Site specific locations and details are listed in the following table.

Transmission Line	Structure(s)	Township	Range	Section	Land Use
Chehalis-Olympia No. 1	23/2	16N	2W	7	R.R. / Private Ag
	24/7	17N	2W	32	R.R. / Private Ag
	26/9	17N	2W	20	R.R. / Private Ag
Olympia-Shelton No.1	10/5, 10/6	19N	3W	32	Private Timber
	17/1	20N	4W	36	Private Timber
Olympia-Shelton No. 2	10/6, 10/7	19N	3W	32	Private Timber
	11/4, 11/5	19N	3W	30	Private Timber
	15/8	19N	4W	1	Private Timber
	17/1	20N	4W	36	Private Timber
	19/5	20N	4W	13	Private Timber
Port Angeles-Sappho No. 1	6/6	30N	7W	14	R.R. / Private Ag
	11/5	30N	7W	6	Private Timber
	12/2, 12/3	30N	8W	1	Private Timber
	31/7	30N	10W	PB 40	USFS
	32/3	30N	11W	PB 45	USFS
	33/1, 33/2, 33/3	30N	11W	14	USFS
	33/4	30N	11W	11	USFS
	35/1	30N	11W	PB 42	USFS
	35/3, 36/1	30N	11W	9	DNR
Shelton-Fairmount No. 2	7/1, 7/2, 7/3, 7/4,	21N	4W	27	Private Timber
	7/5	21N	4W	22	Private Timber
	7/6, 7/7	21N	4W	21	Private Timber
	10/5	21N	4W	9	Private Timber
	15/4	22N	4W	15	Private Timber
	17/1	22N	4W	3	Private Timber
	19/3	23N	4W	36	DNR
	25/2	24N	3W	32	DNR

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: On January 5, 2021, BPA engaged in consultation with the Confederated Tribes of the Chehalis Reservation, the Jamestown S’Klallam Tribe, the Lower Elwha Klallam Tribe, the Makah Nation, the Nisqually Indian Tribe, the Port Gamble S’Klallam Tribe, the Skokomish Tribal Nation, the Squaxin Island Tribe, United States Forest Service – Olympic National Forest, Washington State Department of Natural Resources, and the Washington Department of Archaeology and Historic Preservation for the project locations. The project areas were surveyed by a BPA archaeologist. On February 1, 2022, determination letters which stated no historic properties would be affected by project activities were distributed to the Confederated Tribes of the Chehalis Reservation, the Jamestown S’Klallam Tribe, the Lower Elwha Klallam Tribe, the Makah Nation, the Nisqually Indian Tribe, the Port Gamble S’Klallam Tribe, the Skokomish Tribal Nation, the Squaxin Island Tribe, United States Forest Service – Olympic National Forest, Washington State Department of Natural Resources, and the Washington Department of Archaeology and Historic Preservation (DAHP). The DAHP concurred with the final determination on February 1, 2022. No additional responses were received. If resources are discovered during construction activities, work would cease and the appropriate archaeological resource staff would be contacted.

2. Geology and Soils

Potential for Significance: No

Explanation: The structure replacements involve removing the old poles and replacing them in kind at the same location. No significant ground disturbance is required. Upon completion of project activities, any disturbed sites would be stabilized with native seed mix, or erosion control materials. Stormwater BMPs would be used during the project to protect the surrounding area from runoff and erosion issues.

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

Potential for Significance: No

Explanation: Work would occur in areas maintained as an open transmission line corridor; minimal vegetation may be removed or crushed at the pole location sites. Some common native and non-native plants at the structure locations 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. Disturbed sites would be restored with native seed mix.

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 June 7, 2022. 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 lists for the project counties, in Washington State (Clallam, Mason, and Thurston) from the USFWS on June 7, 2022. Work would occur in areas maintained as an open transmission line corridor with little wildlife habitat. Six project locations, (31/7, 32/3, 33/1, 33/2,

33/3, and 33/4) are located within designated critical habitat for Marbled Murrelet and Northern Spotted Owl. No occurrences of either species are documented to occur at or within 100 yards of any of the structure replacement sites. The structure replacements are highly localized to the existing sites and all work would be confined to the existing right of way. No trees or other vegetation that could be potential nesting habitat would be removed during the projects. Pole replacements would require 1-2 days of work at each structure location. Dawn and dusk timing restrictions would be used to avoid disturbing any potentially present birds. Work would be limited to two hours after sunrise and through two hours before sunset.

One project location on the Chehalis-Olympia No. 1 transmission line, (24/7) is located within designated critical habitat for Oregon Spotted frog. Oregon spotted frogs are 100% aquatic and move with the inundation and recession of surface water. The structure replacements are highly localized to the existing sites and all work would be confined to the existing disturbed footprint. The structure site is located within a wetland boundary, and may become inundated with water during the winter and spring months. No work would occur when the structure site is inundated with water.

No other project locations are within or near any designated critical habitats on known occupied sites for listed species. Due to the lack suitable habitat and no known presence in the project areas, BPA has determined that the projects would have “no effect” on ESA-listed species or their critical habitat. No other special-status wildlife would be impacted by project activities.

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. Sites would be stabilized upon completion of project activities.

6. Wetlands

Potential for Significance: No

Explanation: One project location on the Chehalis-Olympia No. 1 transmission line (24/7) is located within a small wetland. The structure replacement is highly localized to the existing structure site and all work would be confined to the existing disturbed footprint. Wetland matting would be used during the structure replacement to avoid impacts to the wetland. Additionally, no work would occur when the structure site is inundated with water. No other proposed sites are located in or near wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Project activities do not have the potential to impact groundwater or aquifers, including public and private water wells or springs. All spills would be addressed immediately and follow BPA protocol for cleanup and regulatory notifications.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project locations are confined to the existing transmission line ROW corridors. Surrounding land uses include Washington State Department of Natural Resources (DNR),

United States Forest service, private timber, and private rural residential and agricultural properties. Project locations do not include any specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: Proposed actions at existing facilities would not alter or effect visual quality. Structure replacements are in-kind and would not be visibly different from the existing structures.

10. Air Quality

Potential for Significance: No

Explanation: The projects are of a short duration and involve normal construction equipment activities. A small amount of dust and vehicle emissions is expected due to construction.

11. Noise

Potential for Significance: No

Explanation: The projects are located away from any populated areas and places of residence. Noise disturbance would be limited to general construction equipment activities, would be for a short duration, and would occur during daylight hours.

12. Human Health and Safety

Potential for Significance: No

Explanation: The project is considered normal construction and maintenance.

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: Notifications via mailed letters have been sent to all current landowners approximately 3-8 weeks prior to project initiation. The letters provide contact information for BPA to allow feedback from landowners/managers concerning the proposed project.

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

Signed: /s/ Greg Tippetts
Greg Tippetts, EPR-Olympia
Physical Scientist, Environmental

Date: June 17, 2022