Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



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

PP&A No.: 4858

Project Manager: Jeffrey Hurt - TEPL-TPP-2

Location: Cowlitz, Lewis, and Pacific Counties, Washington

<u>Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):</u> B1.3: Routine maintenance.

<u>Description of the Proposed Action:</u> Bonneville Power Administration (BPA) is proposing to replace eight deteriorating wood pole structures and any associated hardware and guys at specific locations in BPA's Olympia 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.

<u>Findings:</u> 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/ <u>Greg Tippetts</u> Greg Tippetts, EPR-Olympia Physical Scientist - Environmental

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel Date: August 19, 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.

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Project Site Descriptions

All structure replacement projects would be at specific locations in Cowlitz, Lewis, and Pacific counties, Washington in BPA's Olympia Maintenance District. All work would be done in existing managed rights-of-way that cross 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
Lexington-Longview No. 1	8/2	8N	3W	24	Rural Residential
Mossyrock-Chehalis No. 1	16/1	13N	1E	31	Private Agricultural
	19/6, 19/7	13N	1W	33	Private Agricultural
	24/2	13N	2W	35	Private Agricultural
Naselle-Tarlett No. 2	5/5	11N	10W	26	Private Timber
	8/2	11N	10W	28	Private Timber
	9/7	11N	10W	32	Private Timber

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 Cowlitz Indian Tribe, the Confederated Tribes of the Chehalis Indians, and the Washington Department of Archaeology and Historic Preservation (DAHP) for the project locations. The project areas were surveyed by a BPA archaeologist. On December 2, 2021, determination letters which stated no historic properties would be affected by project activities were distributed to the Cowlitz Indian Tribe, the Confederated Tribes of the Chehalis Indians, and the Washington DAHP. The Washington DAHP concurred with the final determination on December 3, 2021. No additional responses were received. If resources are discovered during construction activities, work would cease and the appropriate archaeological resources (BPA, THPOs, and WA DAHP) would be contacted.

2. Geology and Soils

Potential for Significance: No

<u>Explanation</u>: The structure replacements involve removing the old poles and replacing them in kind at the same location. No substantial ground disturbance is required. Upon completion of

project activities, any disturbed sites would be stabilized with native seed mix, or erosion control materials. Where needed due to the potential for degraded road conditions, the project also may include improvements to existing access roads and landings associated with the transmission line structures. This may include on and off right-of-way roads where BPA currently has access rights. Access road maintenance may include surface improvements including light blading and rocking, as well as improvements and/or in-kind replacements of existing drainage features, small cross drain culverts, water bars, and ditches. Stormwater BMPs would be used during the project to protect the surrounding area from runoff and erosion issues. No lasting impacts are anticipated from the access road improvements as this work would stabilize any degraded roads.

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. Where needed due to the potential for degraded road conditions, the project also may include improvements to existing access roads and landings associated with the transmission line structures. This may include on and off right-of-way roads where BPA currently has access rights. Access road maintenance may include surface improvements including light blading and rocking, as well as improvements and/or in-kind replacements of existing drainage features, small cross drain culverts, water bars, and ditches. Any road work would occur on existing roads that are maintained for vehicle use.

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 24th, 2022. No ESA-listed plant species are present in the project areas.

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

Potential for Significance: No

Explanation: BPA obtained official species lists for the project locations in Cowlitz, Lewis, and Pacific counties, Washington from the USFWS on June 24th, 2022. Work would occur in areas maintained as an open transmission line corridor with little wildlife habitat. Where needed due to the potential for degraded road conditions, the project also may include improvements to existing access roads and landings associated with the transmission line structures. This may include on and off right-of-way roads where BPA currently has access rights. Access road maintenance may include surface improvements including light blading and rocking, as well as improvements and/or in-kind replacements of existing drainage features, small cross drain culverts, water bars, and ditches. During project activities, work with heavy equipment may cause temporary disturbance to wildlife causing avoidance of the

area. The disturbance would be of a short duration and would not affect any species' long-term activities.

No 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

<u>Explanation</u>: 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 structure location, 24/2 of the Mossyrock-Chehalis, is located within a small impounded wetland next to the highway. The site would be dry during the proposed work window. Additionally, wooden matting would be placed at the structure location within the wetland boundary for heavy equipment. The work is of a short duration, 1-2 days, and the matts would be removed at the completion of the work. Some vegetation may be temporarily impacted by crushing; however, long-term impacts are not anticipated.

No additional proposed sites, including any access road maintenance, are located within or near wetlands

7. Groundwater and Aquifers

Potential for Significance: No

<u>Explanation</u>: 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

<u>Explanation</u>: The project locations are confined to the existing transmission line ROW corridors and off ROW access roads with legal rights. Surrounding land uses include private timber, and private rural residential and agricultural properties and would not be impacted. Project locations do not include any specially-designated areas.

9. Visual Quality

Potential for Significance: No

<u>Explanation</u>: 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

<u>Explanation</u>: The project work would be of a short duration and involves 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 project would be 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

<u>Explanation</u>: 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

<u>Description</u>: Notifications via mailed letters would be 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 Date: <u>August 19, 2022</u>

Physical Scientist, Environmental