

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Comcast Aerial Fiber Optic Cable Upgrade

**Project No.:** LURR-20230355

**Project Manager:** Darin Smith, TERR-CHEMAWA

**Location:** Washington County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B.4.9 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Comcast to upgrade their aerial fiber optic cable on BPA's fee-owned transmission line right-of-way (ROW) south of structure 16/4 on Keeler-Oregon City No. 2 and structure 17/4 on Oregon City Stub in Tigard, Washington County, Oregon. The existing aerial fiber optic cable is currently suspended on wood monopole structures and runs along the south side of Southwest Bull Mountain Road perpendicular to the BPA transmission lines. Comcast would remove the existing aerial fiber optic cable and restring new, similar aerial fiber optic cable from existing wood monopole structures on the north side of Southwest Bull Mountain Road. The work would be completed using a bucket truck operated from the paved road, and no ground disturbance on BPA fee-owned ROW would be required.

**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.

Walker Stinnette  
Environmental Protection Specialist

Concur:

Katey C. Grange  
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:** Comcast Aerial Fiber Optic Cable Upgrade

## **Project Site Description**

The project site is located on BPA fee-owned transmission line ROW south of structure 16/4 on Keeler-Oregon City No. 2 and structure 17/4 on Oregon City Stub in Tigard, Washington County, Oregon (Township 02 South, Range 01 West, Sections 8 and 9). The proposed aerial fiber optic cable upgrade would occur along the north and south sides of Southwest Bull Mountain Road, which runs east-west and perpendicular to the transmission lines. Vehicles and equipment would remain on the paved road, where no exposed soils, vegetation, wetlands, or water bodies are present. Surrounding land use primarily consists of suburban residential properties.

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

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

Potential for Significance: No

Explanation: The Keeler-Oregon City No. 2 and Oregon City Stub transmission lines are considered eligible for inclusion in the National Register of Historic Places (NHRP). However, the proposed undertaking would not alter the integrity or the edibility of these resources. No ground disturbing activities that could affect subsurface resources are required. Therefore on November 29, 2023, BPA determined that the proposed undertaking would have no potential to cause effects to historic properties (BPA CR Project No.: OR 2023 191)

### **2. Geology and Soils**

Potential for Significance: No

Explanation: The proposed action would not require any ground disturbance. Therefore, the proposed action would not impact geology and soils.

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

Potential for Significance: No

Explanation: The proposed action would not require any ground disturbance. Therefore, the proposed action would have no effect on plant species or habitats.

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

Potential for Significance: No

Explanation: Minor and temporary wildlife disturbance could occur from elevated noise and human presence during implementation of the proposed action. However, wildlife species that could be present in the area would likely be habituated to this level of disturbance given the proximity of Southwest Bull Mountain Road and surrounding suburban residential land

uses. There are no documented occurrences of any special-status wildlife species near the project site, and no suitable special-status species habitat is present.

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

Potential for Significance: No

Explanation: The proposed action would not require any ground disturbance. Therefore, the proposed action would not impact water bodies or floodplains and would have no effect on fish species or habitats.

## **6. Wetlands**

Potential for Significance: No

Explanation: The proposed action would not require any ground disturbance. Therefore, the proposed action would not impact wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: The proposed action would not require any ground disturbance. Therefore, the proposed action would not impact groundwater or aquifers.

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

Potential for Significance: No

Explanation: Work vehicles and equipment could temporarily block traffic on Southwest Bull Mountain Road. However, there would be no permanent land use impacts following completion of the proposed action. The project site is not located in a specially designated area.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Equipment and work crews would be temporarily visible within the project site. Upgrading the existing aerial fiber optic cable would result in a minor visual change that would be consistent with the existing visual quality of the project site and would not be overtly noticeable.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed action would generate minor and temporary vehicle emissions in the local area. There would be no long-term change in air quality following completion of the proposed action.

## **11. Noise**

Potential for Significance: No

Explanation: The proposed action would generate minor and temporary noise, which could intermittently exceed current ambient conditions. Noise impacts would be temporary and would only occur during daylight hours (approximately 7 AM to 7 PM). There would be no permanent change in ambient noise following completion of the proposed action.

## **12. Human Health and Safety**

Potential for Significance: No

Explanation: Comcast would be responsible for ensuring that all standard safety protocols, including deploying safety flaggers on Southwest Bull Mountain Road, would be followed throughout implementation of the proposed action to minimize risk to human health and safety. Therefore, the proposed action would not be expected to impact human health and safety.

### **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: The proposed action would occur on BPA fee-owned property. BPA and/or Comcast would notify, involve, and coordinate with all other entities who retain easement rights within the project area, if required.

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

Signed:

Walker Stinnette  
Environmental Protection Specialist