

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Pole Installation and Access Road Improvement on PGE's McLoughlin-Tonquin Line

**Project No.:** 20240101

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

**Location:** Washington County, OR

**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:** The Bonneville Power Administration (BPA) proposes to allow Portland General Electric (PGE) to construct two new transmission pole structures within BPA's existing right-of-way and to make access road improvements on BPA fee-owned property. This work is part of PGE's McLoughlin-Tonquin Line Construction Project, which includes reconductoring and pole replacements on PGE's existing McLoughlin-Tonquin 115kV line and relocation of a portion of the line inside an existing easement on BPA property.

The proposed work includes the construction of a steel pole structure south of PGE's Coffee Creek Substation. The pole would be constructed using a drilled pier installation with foundation dimensions of 8 feet in diameter and 24 feet deep. PGE would pull line from their Coffee Creek Substation to this new pole, crossing underneath BPA's Keeler-Oregon City No. 2 transmission line near structure 22/6.

In addition, PGE would install a wood pole structure between structures 22/6 and 22/7 of BPA's Keeler-Oregon City No. 2 transmission line. The pole would be constructed using direct embedment at a depth of 9.5 feet. PGE would pull their existing McLoughlin-Tonquin Line, which runs parallel to BPA's Keeler-Oregon City No. 2 transmission line in this location, through this new pole structure. All equipment staging and pulling/tensioning would occur off BPA property.

For both pole installations, existing access roads would be used to the extent possible. For locations outside of existing access, drive and crush methods would be used in dry conditions and timber matting would be used in wet conditions. Temporary surface disturbance from structure work and equipment access would be approximately 100 feet ahead-on-line and 100 feet back-on-line at each pole location. Each location would be restored to its original condition once work has been completed.

Finally, PGE would make improvements to 740 feet of access road on BPA fee-owned property west of BPA's Oregon City Substation. Access road improvements would consist of mowing and depositing additional gravels on the existing road prism.

**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.

Jillian Cosgrove  
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:** Pole Installation and Access Road Improvement on PGE's McLoughlin-Tonquin Line

## **Project Site Description**

The project area is located on BPA property, on the fee-owned right-of-way within the Keeler-Oregon City No. 2 transmission line corridor and on the Oregon City Substation. The surrounding land includes industrial and low-density residential properties. Within the transmission line corridor, the vegetation is mowed short and dominated by non-native grasses and forbs. On the Oregon City Substation, the vegetation includes native and non-native grasses and forbs with a line of trees along the west side of the access road. The project area is within the Coffee Lake Creek-Willamette River Watershed. There are no wetlands or water bodies present within or near the project area.

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

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

Potential for Significance: No with Conditions

Explanation: BPA initiated consultation with a determination of no historic properties affected on September 11, 2024 (BPA CR Project No.: OR 2024 114), with the stipulation that an archaeological monitor be present for any excavation or drilling. Consulting parties included the Confederated Tribes of the Grand Ronde Community of Oregon, the Confederated Tribes of Siletz Indians, and the State Historic Preservation Office (SHPO). No comments were received.

Notes:

- PGE would need to provide a cultural resources monitor, in coordination with BPA's cultural lead, for any excavation or drilling.
- PGE would submit an Archaeological Monitoring Report to BPA after construction is complete.

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

Potential for Significance: No with Conditions

Explanation: Localized soil disturbance would occur from excavation and drilling during the pole installations and the transport of vehicles and equipment outside of existing access roads. However, soils and geology within the project area have been previously disturbed from the development of the Coffee Creek substation, transmission line corridor, and the Oregon City Substation. Timber matting would be used in wet conditions on all undeveloped access routes to reduce erosion.

Notes:

- PGE would use standard construction erosion control measures, including timber matting in wet conditions. PGE would walk down the site prior to construction to determine the need for matting.

- The project area would be restored to its original condition (leveled and planted with grass seed) after completion of the proposed work.

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

Potential for Significance: No

Explanation: There are no documented occurrences of any special-status plant species present within or near the project area, and no suitable special-status species habitat is present. Impacts to existing vegetation would include the removal or crushing of mostly non-native grasses and forbs in the project area. Temporarily disturbed areas will be stabilized and reseeded with grass seed. Standard construction best management practices would minimize vegetation impacts, including the spread of noxious weeds. Therefore, the proposed action would have little impact to plants.

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

Potential for Significance: No with Conditions

Explanation: Minor and temporary wildlife disturbance could occur from construction noise. There are no documented occurrences of any special-status wildlife species near the project area. No suitable special-status species habitat is present within the project area, but tall trees just outside the project area could be suitable nesting habitat for migratory birds or bald eagles.

Notes:

- Complete the project outside of the eagle breeding/nesting season (i.e., between September 1 and December 31), if possible.

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

Potential for Significance: No

Explanation: No water bodies, floodplains, or fish-bearing streams are present within or near the project area. Standard construction best management practices would prevent indirect impacts to off-site water bodies, floodplains, and fish. Therefore, the proposed action would not impact water bodies and floodplains and would have no effect on fish species or habitats.

### **6. Wetlands**

Potential for Significance: No

Explanation: There are no wetlands in or near the project area. Therefore, the proposed action would not impact wetlands.

### **7. Groundwater and Aquifers**

Potential for Significance: No with Conditions

Explanation: The poles would be installed at depths of 9.5 and 24 feet below ground. There is one United States Geological Survey groundwater level monitoring site within 0.5 mile from the project area (site ID 452039122462201). Groundwater was measured at 115 ft and 125 ft below the ground surface. Therefore, the pole installation would not reach ground water levels. Additionally, best management practices for hazardous materials would be used to reduce risk of contamination of groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:

- PGE shall notify BPA in a timely manner for any reportable releases of hazardous substances or breaches of environmental requirements and shall mitigate and abate adverse environmental impacts.
- PGE shall not use or store any hazardous materials on BPA property (i.e., fuels, herbicides, solvents, paints, etc.).

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

Potential for Significance: No

Explanation: The land in the project area is currently used as a transmission right-of-way and substation, while adjacent land includes industrial and low-density residential properties. The proposed action would not change the land use in the project area and would not impact adjacent land uses. The project area is not in a specially-designated area.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The project area contains existing transmission line and substation infrastructure. Therefore, the proposed work would not change the visual quality of the area.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and vehicle emissions in the local area. There would be no long term change to air quality following the proposed action.

## **11. Noise**

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment would create noise above current ambient conditions. Construction-related noise may be audible to a few private residences and businesses near the project site. Noise impacts would be temporary and intermittent and would only occur during daylight hours (approximately 7 AM to 7 PM). There would be no long-term change in ambient noise.

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

Potential for Significance: No

Explanation: Standard construction best management practices would minimize risk to human health and safety. See #7, Groundwater above regarding measures that would be implemented to reduce the potential for hazardous substance release. Therefore, the proposed action would not 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: All proposed work would occur on BPA fee-owned property. No landowner notification, involvement, or coordination would be required.

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

Signed:

Jillian Cosgrove  
Environmental Protection Specialist