

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY24 Ross Priority Poles

**Project No.:** 6787

**Project Manager:** Raymond Cheng, TEPL-TPP-1

**Location:** Columbia and Multnomah County, Oregon

**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 five deteriorating wood pole structures, any associated hardware and guys, and electrical switches at specific locations in BPA's Longview District. The five structures proposed for replacement include Allston-Driscoll #1 2/4, St. Helens-Allston #1 5/4 and 16/6, and St Johns-St Helens #1 3/1 and 18/3. For all structures, the work would include removing the existing wood pole structures (and guy wires if present) and replacing them in the same location. Work areas would be approximately 100 feet by 100 feet at each of the structure replacement locations. Existing access roads would require improvements, including blading, grading, placing new rock, and compacting. No new roads would be constructed.

The proposed action would maintain reliable power in the region. The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

All work would be in accordance with the National Electrical Safety Code and BPA standards.

**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.<sup>1</sup>

/s/ Zoe Wellschlager

Zoe Wellschlager

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer     Date: April 11, 2025

Attachment(s):

CX Checklist

MIT FY24 Ross Priority Poles

FY24 Ross PP Effect Determination

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<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

# 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:** FY24 Ross Priority Poles

## **Project Site Description**

Structures being replaced are on ROWs with a surrounding mix of local government and privately owned timber land that is relatively flat and surrounded by various stages of timber replanting.

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

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

Potential for Significance: No with conditions

Explanation: On October 7<sup>th</sup>, 2024, BPA initiated consultation with the Confederated Tribes of the Grand Ronde, the Cowlitz Indian Tribe, and the Oregon State Historic Preservation Office (SHPO). The Oregon SHPO responded and concurred with the APE on October 23<sup>rd</sup>, 2024. There were no other responses to the initiation letter from consulting parties. On April 1st, 2025, the Oregon SHPO concurred with the determination of No Adverse Effects to Historic Properties. No other responses to the determination letter were received within 30 days.

Notes:

- In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties. Please provide the project sponsor with a copy of BPA's Inadvertent Discovery Protocol.

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

Potential for Significance: No

Explanation: Localized soil disturbance would occur during wood pole replacement and road improvements. Standard construction erosion control measures would be utilized as necessary to minimize soils from traveling outside of the work areas.

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

Potential for Significance: No

Explanation: Minimal disturbance to vegetation is anticipated. There would be no effect to ESA-listed plant species. No impacts to state or federally sensitive species are anticipated. Project activities would be limited to the already impacted access road and transmission line right-of-way and would not substantially alter existing plant communities.

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

Potential for Significance: No

Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise and human presence. The project would have no impacts to state or federally listed sensitive species.

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

Potential for Significance: No

Explanation: The project area is not located within a floodplain and there are no nearby water bodies that support resident, anadromous, or ESA-listed fish. Erosion control best management practices would ensure that sedimentation would not enter into any water body.

#### **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are located within the project area.

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

Potential for Significance: No

Explanation: No use of groundwater proposed. Maximum depth of disturbance would be about 12 feet below ground surface and work is proposed to occur during the dry season when interactions with groundwater would be minimized.

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

Potential for Significance: No

Explanation: No change in land use would occur. No specially-designated areas are present in the work areas.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of the wood pole and associated components would be similar and replaced in the same location; therefore, there would not be a change to the visual quality of the area.

#### **10. Air Quality**

Potential for Significance: No

Explanation: The project would have a temporary impact on air quality from a small amount of vehicle emissions and dust generated during construction.

## 11. Noise

Potential for Significance: No

Explanation: There would be temporary construction noise. Operational noise of the transmission line would not change.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed action would allow safe and timely access to the transmission line which would help reduce outage times and maintain reliable power in the region.

### 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 activities have been coordinated with landowners.

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

Signed: /s/ Zoe Wellschlager  
Physical Scientist

Date: April 11, 2025