

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY22-24 Alvey District Priority Pole Replacements

Project No.: 6279

Project Manager: Rusty Ludt, TEPL-TPP-1

Location: Benton, Douglas, Lane, and Linn counties, Oregon

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance

Description of the Proposed Action: BPA proposes to replace deteriorating wood pole structures and associated structural/electrical components (e.g. cross arms, insulators, guy anchors, etc.) on multiple transmission lines in the Alvey district.

See table below for structure names and locations on the transmission lines.

Transmission Line/ROW	Structure #	County, State
Albany – Lebanon No. 1	17/3, 17/4, 17/5, 17/9	Linn, OR
Eugene – Alderwood No. 1	14/3, 17/11	Lane, OR
Eugene – Alvey No. 2	5/3, 7/1, 8/5, 9/2, 13/8	Lane, OR
Hawkins – Alvey No.1	2/2, 2/3, 3/1, 3/3, 3/5, 3/7, 3/10, 5/5	Lane, OR
Lookout Point PH – Lookout Point No. 1	1/1	Lane, OR
Lookout Point – Alvey No. 1	1/12, 5/3, 15/5, 15/6	Lane, OR
Martin Creek – Drain No.1	2/1, 2/8, 4/5, 5/6, 5/8, 6/5, 6/7, 7/6, 8/6, 11/2, 11/4	Douglas, Lane, OR
Mt. Vernon Tap to Lookout Point – Alvey No. 2	6/2	Lane, OR
Santiam – Toledo No. 1	29/4	Benton, OR
Thurston – McKinzie No. 1	1/11	Lane, OR

Replacement would be in-kind and would utilize the existing holes to minimize ground disturbance. If necessary, an auger would be used to remove any loose soil from the existing hole prior to new wood pole placement. Work areas would be about 50 feet by 50 feet at each of the structure replacement locations. One of the structures is within a wetland area: Lookout Point – Alvey No 1 15/5. The poles would have pole wraps and a culvert footing to protect surrounding area from leaching.

Access road maintenance would be limited to minor blading, grading, and rocking of access road segments that have become impassable. All road maintenance would take place in the existing road prism.

The proposed action would allow safe and timely access to the transmission line, which would help reduce outage times and maintain the safety and reliability of power infrastructure in the region. All work would be in accordance with the National Electrical Safety Code and BPA standards.

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)).

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. ¹

/s/ Steven D. Selser

Steven D. Selser
Physical Scientist (Environmental)

Concur:

Katey Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ 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.

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Project Site Description

Structures being replaced are in a mix of agricultural, industrial, and forest land. No waterbodies would be near project work areas. Lookout Point – Alvey No 1 15/5 is within a wetland area.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: On September 25, 2024, BPA initiated consultation with the Confederated Tribes of the Grand Ronde Community of Oregon, the Cow Creek Band of the Umpqua Indians, the Confederated Tribes of the Siletz, the Klamath Indian Tribe, and the Oregon State Historic Preservation Office (SHPO). On September 25, 2024, SHPO concurred with BPA's delineation of the Area of Potential Effects (APE) and assigned SHPO No. 24-1769 to the consultation. On April 3, 2025, BPA determined that there would be no adverse effect to historic resources and sent the determination to the consulting parties along with the cultural resources survey report. On April 29, 2025, BPA received a letter from the Oregon SHPO stating there were two locations in the APE with cultural resources present, Albany-Lebanon No. 1 5/4 and Lookout Point-Alvey No. 2 15/8. These two locations were removed from the project. On May 6, 2025, BPA replied to the Oregon SHPO asking for concurrence of a no adverse effect determination on the pole locations where no resources were identified. On May 9, 2025, Oregon SHPO responded and concurred with the determination of no adverse effect to historic resources at the pole locations for this undertaking where no resources were identified. No other comments were received from consulting parties.

The 30-day comment period for the National Historic Preservation Act (NHPA) Section 106 consultation has expired for the FY22-24 Alvey Priority Poles Project, OR SHPO # 24-1769, BPA Project # OR 2024 122. The project may proceed as planned for the pole locations listed, with a determination of [§36 CFR 800.5(b)] – no adverse effect.

2. Geology and Soils

Potential for Significance: No

Explanation: Localized soil disturbance would occur during wood pole replacement and access road improvements. Standard construction erosion control measures would be utilized as necessary.

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 with Conditions

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 with the implementation of the minimization measures identified below.

Notes:

- Streaked horn lark (SHL) timing restrictions are between April 16 and August 15, work would not occur in this time period within SHL habitat: Structures Albany – Lebanon No. 1 5/4 and Santiam – Toledo No. 1 29/4.
- Western pond turtle timing restrictions (between May 15 and July 15) and conservation measures would be in place for structures: Eugene – Alderwood No. 1 14/3, Eugene – Alvey No. 2 5/3 & 7/1, Lookout Point PH – Lookout Point No. 1 1/1, Lookout Point – Alvey No. 1 14/2, 15/5, and 15/6, and Martin Creek – Drain No. 1 2/1.

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 combined with the distance to the nearest waterbody would ensure that sedimentation would not enter into any water body.

6. Wetlands

Potential for Significance: No

Explanation: One structure is located within the NWI wetland layer. This structure would have a pole wrap and be within a culvert footing to prevent leaching into surrounding soil. Excavation would occur in previously-established holes and would not result in new wetland fill or excavations.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No use of groundwater proposed. Maximum depth of disturbance would be about 13 feet below ground surface and would likely not intersect groundwater for most structures. Pole wraps would be installed around the two structures in wetlands that may intersect with groundwater.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use. No specially-designated areas.

9. Visual Quality

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way and access road prisms. Replacement of the wood pole and associated components would be in kind 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/ Steven D. Selser**
Steven D. Selser
EPR-CHEMAWA

Date: **May 12, 2025**