

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Transmission Line and Communication Tower Safety Upgrades—
Fall Protection through 2030

Project Manager: Multiple

Location: Multiple locations in Idaho, Oregon, Washington, Montana, California, Nevada, Utah, and Wyoming

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B4.6 Additions and modifications to transmission facilities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to install work safety fall protection equipment on its lattice-steel and tubular-steel electrical transmission towers and on its monopole and lattice-steel communication towers throughout the BPA service territory.

BPA would install a cable safety system — typically the MSA Latchways system— on the vertical climbing path of each tower. The cable system would be connected to the tower with a series of brackets approximately every 10 feet and a top and a bottom anchor. Once installed, workers would use the system when climbing the tower by attaching their harness to a specialized pulley which would allow them to glide along the safety cable as they climb. Installation would require a line truck, and two-to-three workers in the tower and one-to-two workers on the ground.

These actions would occur on existing transmission and communication towers that cross both BPA fee-owned land and land where BPA possesses an agreed upon easement with the landowner. The towers would be accessed using BPA's existing access road system and the proposed work would not require ground-disturbing activities.

Each project would be reviewed by the BPA NEPA lead to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

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; 89 FR 34074, April 30, 2024), 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

Jeremy Doschka
Environmental Protection Specialist

Concur:

Katey C. 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.

Proposed Action: Transmission Line and Communication Tower Safety Upgrades—
Fall Protection

Project Site Description

Existing transmission and communication towers located in BPA's service territory, including Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: BPA Cultural Resources staff has determined that the proposed undertaking meets Stipulation I.A.1 of *Programmatic Agreement Among the Bonneville Power Administration, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, the Idaho State Historic Preservation Office, the Montana State Historic Preservation Office, and the Advisory Council on Historic Preservation to Address Effects to BPA Transmission Lines* (executed December 19, 2024). No further Section 106 consultation is required.

2. Geology and Soils

Potential for Significance: No

Explanation: The proposed activities would not require ground-disturbing activities.

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

Potential for Significance: No

Explanation: The proposed activities would not require plant removal or disturbance. In locations on BPA access roads where protected plant species are known to occur (e.g., Kincaid's lupine), established measures or timing restrictions would be implemented, as appropriate. There would be no effect to Endangered Species Act (ESA)-listed plant species.

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

Potential for Significance: No

Explanation: The proposed activities would not require habitat removal or disturbance. Minor, intermittent noise associated with installation activities has the potential for minor, temporary disturbance to nearby wildlife species. In locations along BPA access roads where protected wildlife species are known to occur (e.g., Oregon spotted frog, Fender's blue butterfly, and Taylor's checkerspot butterfly), established measures or timing restrictions would be implemented, as appropriate. There would be no effect to Endangered Species Act (ESA)-listed wildlife species.

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

Potential for Significance: No

Explanation: The proposed activities would not require ground disturbance or in-water work.

6. Wetlands

Potential for Significance: No

Explanation: The proposed activities would not require ground disturbance. In locations along BPA access roads where wetlands occur, established measures or timing restrictions would be implemented, as appropriate.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed activities would not require ground disturbance. No groundwater or aquifers would be impacted by the project.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur.

9. Visual Quality

Potential for Significance: No

Explanation: The brackets and cables would not change the visual character of the facilities.

10. Air Quality

Potential for Significance: No

Explanation: Small amounts of temporary dust and vehicle emissions may occur while line trucks travel existing access roads.

11. Noise

Potential for Significance: No

Explanation: Minor, intermittent noise associated with upgrade activities would occur during daylight hours, typically over six to eight hours in a single day. Operational noise would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: This maintenance activity would improve safety of workers along BPA's transmission system.

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: For fall protection installation work that occurs within non-BPA fee-owned parcels, BPA would coordinate access with the underlying landowner.

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

Signed:

Jeremy Doschka, ECT-4
Environmental Protection Specialist