

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Wood Pole Wildfire Retardant Application Through 2030

Project Manager: Multiple

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

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance; B4.6 Additions and modifications to transmission facilities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to apply fire retardants to select wood poles throughout the BPA service territory. The proposed work is expected to reduce the potential impacts of wildfires on service and grid reliability.

BPA would apply one of two types of fire retardant treatments – a liquid coating or a wrap – depending on site-specific and modeled flame conditions. The liquid fire retardant is a latex-based coating and applied with typical painting tools. Prior to the liquid coating application, a fiberglass cloth backing may be fastened to wood poles where poor adhesion is expected. The fire retardant wraps would be installed in up to three courses, and up to two layers, using nails or staples. Both treatments would extend up to approximately 11 feet above and up to one foot below ground level and would require excavation of a temporary trench around the base of each pole approximately one foot wide and one foot deep. Following application, the trench would be filled in. If needed, signage on the poles would be moved farther up the pole — above the height of the treatment. All work would be performed using typical work trucks and hand tools including flatbed work trucks, trucks equipped with air compressors, and pneumatic tools.

These actions would occur on existing wood pole transmission structures primarily located on land where BPA possesses an agreed-upon easement with the landowner; however, some structures may be located on BPA fee-owned land. The structures would be accessed using BPA's existing access road system. No road work, landings, or staging areas would be needed to perform the fire retardant applications. New poles would not be installed.

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 proposed actions would be reviewed by BPA National Environmental Policy Act (NEPA) leads to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

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: Wood Pole Wildfire Retardant Application Through 2030

Project Site Description

Existing wood pole transmission structures located in BPA's service territory, including Idaho, Oregon, Washington, Montana, California, 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: Ground disturbance would be limited to the area within approximately one foot of each pole. Erosion control best management practices (BMPs) would be implemented, if needed, to prevent soil loss from project areas.

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

Potential for Significance: No

Explanation: The proposed activities may cause minor crushing of existing vegetation surrounding transmission line structures. The activities would not impact any Federal or state special-status species or habitats. There would be no effect to ESA-listed species in the area. The proposed activities would not require plant removal except potentially within approximately one foot of each pole. In locations on BPA access roads or surrounding transmission line structures where ESA-listed, or other sensitive plant species are known to occur, established measures or timing restrictions would be implemented, as appropriate, so that activities would have no effect on 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 project activities has the potential for temporary disturbance to nearby wildlife species. In those locations containing nesting sensitive Federal or state bird species (e.g. bald and golden eagles), timing restrictions would be employed to minimize nest disturbance.

There would be no effect to ESA-listed species in the area. In locations along BPA access roads or surrounding transmission line structures where ESA-listed wildlife species are known to occur, established measures or timing restrictions would be implemented, as appropriate, so that activities would have no effect on ESA-listed wildlife species or designated critical habitat.

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 in-water work. Erosion control BMPs would be implemented, if needed, to prevent sedimentation impacts to nearby waterways.

6. Wetlands

Potential for Significance: No

Explanation: The proposed activities would not create permanent wetland impacts. Erosion control BMPs would be implemented, if needed, to prevent sedimentation impacts to nearby wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed fire retardants are non-toxic. Spill prevention measures would be utilized during project activities. No groundwater or aquifers would be impacted by the activities.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur and activities would not impact land use.

9. Visual Quality

Potential for Significance: No

Explanation: The fire retardants would alter the appearance of approximately the bottom 11 feet of treated poles; however, the colors and tones of the treatments are not substantially different than the range of colors and tones typical to in-service wood poles. The fire retardant treatments would not substantially alter the silhouette of existing wood poles. The activities would have minimal impacts to visual quality and the results would remain consistent with the existing surroundings of the transmission line corridor.

10. Air Quality

Potential for Significance: No

Explanation: The activities would generate a small amount of vehicle emissions and dust during construction.

11. Noise

Potential for Significance: No

Explanation: Some temporary construction noise would occur during daylight hours. The operational noise of the transmission lines would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: Workers would follow all standard safety protocols. Activities would not impact human health or 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 activities would be coordinated with landowners prior to beginning work.

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

Signed:

Jeremy Doschka
Environmental Protection Specialist