

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY22-FY24 Chemawa District Priority Pole Replacements

**Project No.:** 6730

**Project Manager:** James Barnhart, TEPL-TPP-1

**Location:** Marion, Polk, Tillamook, Washington, and Yamhill 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 Chemawa district.

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

Transmission Line/ROW	Structure #	County, State
Boyer-Tillamook No 1	7/6, 11/2, 15/8, 16/3, 17/5, 19/1, 19/5, 20/6, 21/1, 21/2, 21/5	Tillamook, OR
Carlton-Tillamook No 1	9/5, 9/7, 9/8, 15/7, 19/2, 31/10	Tillamook and Yamhill, OR
Forest Grove-McMinnville No 1	4/7, 8/10, 9/2, 9/5, 10/6, 10/7, 11/2, 11/4, 11/5, 11/6, 13/1, 14/2, 15/9	Washington and Yamhill, OR
Keeler-Forest Grove No 2	10/3	Washington, OR
Oregon City-Chemawa No 2	7/12, 16/15, 16/16, 24/14	Marion, OR
Salem-Grand Ronde No 1	2/1, 2/2, 13/3	Polk, OR
Timber Tap to Forest Grove-Tillamook No 1	2/5, 3/1	Washington, 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.

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 reliable power 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.<sup>1</sup>

/s/ Steven D. Selser

Steven D. Selser

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey Grange

NEPA Compliance Officers

Date: June 16, 2025

Attachment(s): Environmental Checklist

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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:** FY22-FY24 Chemawa District Priority Pole Replacements

## **Project Site Description**

Structures being replaced are in a mix of agricultural, industrial, and forest land on privately owned, and local government (county) held property. No waterbodies or wetlands would be near project work areas.

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

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

Potential for Significance: No

**Explanation:** BPA initiated consultation on February 24, 2025 (BPA CR Project No.: OR 2024 159, SHPO Case No.: 25-0832). Consulting parties included the Confederated Tribes of Grand Ronde, the Confederated Tribes of the Siletz Indians, Oregon Department of State Lands (ODSL), and the Oregon State Historic Preservation Office (SHPO). On February 24, 2025, SHPO assigned the project SHPO Case No. 25-0832, and concurred with the APE and proposed identification efforts on February 28, 2025. The Confederated Tribes of Grand Ronde sent an autoreply to BPA's initiation of consultation email on February 24, 2025. On February 26, 2025, ODSL acknowledged receipt of the initiation of consultation letter. No other responses were received during the initial 30-day period. The survey was conducted on March 31, April 2, 7-8, and 15-16, 2025, and no archaeological resources were observed in the project area of potential effects. BPA has determined that this undertaking would have no adverse effect on the historic transmission lines. The survey report and determination of **no adverse effect to historic properties** was sent to consulting parties on May 16, 2025. ODSL responded on May 16, 2025, with an acknowledgement of receipt. On June 12, 2025, the SHPO responded, concurring with the determination of effects. No other responses were received during the 30-day period.

### **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

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 Horned Lark (SHL) timing restrictions are between April 16 and August 15, work would not occur in this time period within SHL habitat Structures: Forest Grove-McMinnville No 1 4/7, 14/2 and Oregon City-Chemawa No 2 7/12, 16/15, 16/16, 24/14.
- Marbled Murrelet (MAMU) timing restrictions are between April 1 – September 15. No work would be done on these structures between April 1 – August 5. For structures: Boyer-Tillamook No 1 7/6, 20/6, 21/5, Carlton-Tillamook No 1 15/7, and Timber Tap to Forest Grove-Tillamook No 1 3/1, daylight timing restrictions would be from August 6 – September 15, work can be performed but must begin at least two hours after sunrise and at least two hours before sunset.

#### **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: No wetlands are 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.

#### **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/ Steve Selser  
Steven D. Selser  
EPR-CHEMAWA

Date: June 16, 2025