

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Chehalis-Covington No. 1 Insulator Replacements & Access Road Improvements (update to previous CX issued on May 6, 2025)

**PP&A No.:** 6615

**Project Manager:** Tina Edwards – TEPL-CSB-2

**Location:** Pierce & King Counties, Washington

**Categorical Exclusion Applied (10 C.F.R. Part 1021):** B1.3-Routine Maintenance

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to replace insulators, remedy impairments and improve access roads in multiple locations along the Chehalis-Covington No. 1 transmission line. BPA owns and operates this transmission line, located on private and tribal lands in Pierce and King Counties, Washington. This line is supported by steel lattice structures. BPA would perform non-ground disturbing maintenance activities on structures 47/5 to 56/3, and structures 64/1, 64/3, 64/4, 64/5, and 65/1. These activities include the replacement of insulators, installation of hold down weights, and installation of fall protection flanges. BPA has also identified one impairment to the line, adjacent to structure 49/2. A transmission line impairment is where the distance between the ground surface and the energized conductor does not have adequate clearance for safe and reliable operation. This clearance violation does not meet the National Electrical Safety Code (NESC) standards and BPA is required to remedy the impairment in a specified amount of time. The impairment would be remedied by installing a wood pole prop structure in the right-of-way (ROW), approximately 10 feet southwest of structure 49/2. This new prop structure would be installed by embedding the wood poles, up to 10 feet, in the ground and installing guy wires with anchor plates. Permanent work areas include the new prop structure adjacent to 49/2, approximately 100 feet by 100 feet, as well as new access roads and landings, approximately 3 acres total. Temporary work areas include existing landings and access roads adjacent to the structure locations, approximately 15 acres total.

In addition to the structure work, BPA proposes to improve access roads and landings between spans 50/1 and 66/4. The access road work includes approximately 5 miles of improvements which consists of light blading and addition of rock, approximately 1 mile of reconstruction, which consists of heavier blading and addition of rock, and approximately 450 linear feet of new road surface, which consists of blading to establish the road prism, placement of base and surface rock, and compaction. BPA would also construct approximately 32 graded and rocked landings around transmission line structures, with dimensions ranging from 40 feet by 15 feet to 60 feet by 60 feet. Landings allow for safe access to the transmission line for maintenance equipment. Surface water control features would also be installed to properly channel run-off and stormwater off the road surface into established natural drainages. BPA would install approximately three water bars and seven drain dips to facilitate stormwater drainage. BPA also plans to install eight cross-drain culverts, ranging in diameter from approximately 12 to 36 inches and from approximately 30 to 40 feet in length.

Equipment generally used for this work includes an excavator, boom trucks, graders, roller compactors, gravel trucks, and light duty trucks. The work would be performed in 2025.

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 1021.102 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; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review. <sup>1</sup>

/s/ Samantha Rinker

Samantha Rinker

Biological Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: August 12, 2025

Attachment(s): Environmental Checklist, Effects 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 the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), 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:** Chehalis-Covington No. 1 Insulator Replacements & Access Road Improvements

## **Project Site Description**

The proposed action is in the Puget Lowland ecoregion of western Washington. This ecoregion is surrounded by the Olympic Mountains to the west and the Cascade Mountains to the east. Significant stretches of coastline in the northern San Juan Islands and the southern Puget Sound also define the region. The low-elevation area is also known for its rich farmland in the floodplains, as well as urban areas like Olympia, Tacoma, and Seattle. The Puget Lowland has a mild maritime climate, with a wide range of precipitation that determines the plant and soil composition of its Level IV ecoregions. Douglas-fir and western hemlock are the dominant tree species.

The proposed action would occur within BPA rights-of-way (ROWs) and access roads for the Chehalis-Covington No. 1 transmission line, on tribal and private lands. Most of the proposed work areas are within, or on the fringes of, suburban communities, from BPA's South Tacoma Substation to Covington Substation. Approximately two-line miles run through the Muckleshoot Reservation. The area is highly developed, with a variety of land uses, including residential housing, local businesses, and a quarry.

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

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

Potential for Significance: No

**Explanation:** Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act, BPA evaluated the proposed project and developed an Area of Potential Effects (APE). On November 1, 2024, BPA initiated consultation on the proposed undertaking with the Muckleshoot Indian Tribe, the Puyallup Tribe of Indians and the Washington Department of Archaeology & Historic Preservation (DAHP).

BPA conducted background research with the Washington state cultural resource database, followed by an intensive field survey of the APE with the exception of lands within the Muckleshoot Reservation. There were no archaeological resources identified. On April 23, 2025, BPA made a determination that the project would have no adverse effect to historic or cultural resources. WA DAHP concurrence on the no adverse effect determination was received on April 24, 2025. The Puyallup Tribe of Indians concurrence was also received on April 24, 2025. The Muckleshoot Indian Tribe concurrence was received on May 6, 2025.

BPA to conduct archaeological pedestrian survey on June 6, 2025, on the remaining portions of the APE located on the reservation. There were no archaeological resources identified. On June 30, 2025, BPA determined that its original determination and overall

finding of no adverse effect to historic properties is still appropriate. WA DAHP concurrence on the no adverse effect determination was received July 2, 2025. No other responses were received.

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.

## **2. Geology and Soils**

Potential for Significance: No

Explanation: Ground disturbance would include excavation to install the new prop structure. Most of the work would occur in the existing dirt and gravel access road prism, where a road-base of rock already exists.

Standard construction erosion control measures would be utilized as necessary to prevent erosion and disturbed areas would be stabilized with mulch and a native seed.

Notes:

- BPA and BPA's contractors would develop and implement an erosion and sediment control plan during construction, to minimize the risk of erosion and sedimentation. Disturbed soils would be seeded and stabilized with mulch or hydroseed upon project completion.

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

Potential for Significance: No

Explanation: Local plants would be disturbed at the prop structure location, as well as landing and access road improvement locations.

Work area footprint would be limited to the existing transmission right-of-way corridor and minimized as much as possible at the work site locations. Upon project completion, the area would be re-graded to match existing contours and seeded with a native seed mix.

In accordance with the Endangered Species Act (ESA), BPA obtained an official species list from U.S. Fish and Wildlife Service (USFWS) on February 3, 2025. No ESA-listed plants or habitat are present in the project area, therefore, the project would have "No Effect" on ESA-listed plant species. BPA reviewed available data sources, and no special status state species and/or habitat is documented in the project area.

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

Potential for Significance: No

Explanation: Local wildlife, such as small to midsized mammals and birds, could be disturbed by project activities, assuming they are present in the project area. However, disturbance would be temporary, and the surrounding landscape provides ample habitat and cover for displaced animals.

In accordance with the ESA, BPA obtained an official species list from USFWS on February 3, 2025. After a review of the habitat within the project area, and recorded ESA-listed species observations, BPA determined that the project would have "No Effect" on marbled murrelet, streaked horned lark, yellow-billed cuckoo, northwestern pond turtle, and the

candidate species monarch butterfly and Suckley's Cuckoo bumble bee. BPA reviewed available data sources, and no special status state species and/or habitat is documented in the project area.

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

Potential for Significance: No

Explanation: There are two ESA fish streams in the project area, the White River and the Puyallup River. However, no in-water work is planned, and no direct impacts to waterbodies and floodplains are anticipated. There are several ephemeral drainages for stormwater in the project area, but all work would be completed during the dry season, post July 15<sup>th</sup>, when ephemeral drainages are likely to be dry.

## **6. Wetlands**

Potential for Significance: No

Explanation: A wetland delineation was not completed for the project. However, suspected wetland areas with appropriate soil and vegetation characteristics would be avoided by placing any new structure, landing or access road outside of suspected wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No excavation would occur below groundwater level.

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

Potential for Significance: No

Explanation: The project would not change existing land use, nor is the project within a specially-designated area.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Replaced insulators and other hardware would be visually consistent with the existing structures and surrounding areas. The prop structure would be consistent with the existing structures and visual quality of the area. The proposed project would not substantially change the existing visual character of the area.

## **10. Air Quality**

Potential for Significance: No

Explanation: Some minor, local impacts to air quality would occur due to construction activity and vehicular traffic, however impacts would be temporary and insignificant. There would be no long-term change in air quality following completion of the project.

## 11. Noise

Potential for Significance: No

Explanation: Construction activity would generate noise. However, impacts would be local and relatively minor. All project activity would occur during daylight hours, and there would be no long-term change in ambient noise following completion of the project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: A site-specific safety plan would be developed by the contractor and implemented during construction. Overall, the project would improve the safety and reliability of the transmission system, and provide safer access to transmission structures during inspection, maintenance, and emergency response.

### **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: BPA Realty is in coordination with tribal and private landowners.

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

Signed: /s/ Samantha Rinker

Samantha Rinker  
Biological Scientist (Environmental)

Date: August 12, 2025