

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Holcomb-Naselle Distressed Structure Replacement

**Project No.:** 6889

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

**Location:** Pacific County, Washington

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

**Description of the Proposed Action:** Bonneville Power Administration (BPA) is proposing to remedy a distressed structure on the Holcomb-Naselle transmission line. The structure, 8/6, is located in an active landslide area. The proposed solution involves eliminating, moving, or rebuilding several structures to avoid the landslide area and to meet new specifications. The structures include 8/3, 8/4, 8/5, 8/6, 8/7, and 9/1. The proposed project would increase the height of 8/5 and 9/1 while removing 8/6 and 8/7. Conductor and fiber would be retensioned between 8/3 and 9/1. The work area would be approximately 100 feet by 200 feet at each structure. Road work to safely access the structures would be necessary and would include approximately 1,000 feet of road improvement. Fire wraps would also be added to poles where required.

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/ Jonnel Deacon

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer     Date: August 21, 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 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:** Holcomb-Naselle Distressed Structure Replacement

## **Project Site Description**

The structures being replaced and associated road work are on private timber land in Pacific County, Washington.

## **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 and 36 CFR 800, BPA initiated consultation with the Washington Department of Archaeology and Historic Preservation (DAHP), the Cowlitz Tribe, and the Shoalwater Bay Tribe on June 9, 2025. DAHP concurred with the APE and the determination of no adverse effect on June 30, 2025. No other responses were received within 30 days.

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: Localized soil disturbance would occur during wood pole replacement and road work. Standard construction erosion control measures would be utilized as necessary to minimize soils from traveling outside of the work areas.

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

Potential for Significance: No

Explanation: 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 in the area.

### **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. Wildlife would use adjacent habitat during construction and would return to the area upon completion. The project would have no impacts to state or federally listed sensitive species.

## **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, but there is a nearby water body (100 feet away) that supports resident, anadromous, or ESA-listed fish. Erosion control best management practices combined with the presence of vegetation would ensure that sedimentation would not enter into any water body.

## **6. Wetlands**

Potential for Significance: No

Explanation: Structure replacement and road work would not occur in wetlands and no wetland impacts are proposed.

## **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 and work is proposed to occur during the dry season when interactions with groundwater would be minimized.

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

Potential for Significance: No

Explanation: No change in land use would occur. No specially-designated areas are present in the work areas.

## **9. Visual Quality**

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of the wood pole and associated components would be replaced in a similar kind and location. There would be a minimal change to the visual quality of the area associated with increased structure heights that would be consistent with the overall visual character 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.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed action would help 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/ Jonnel Deacon      Date: August 21, 2025  
Jonnel Deacon  
EPR-Olympia