Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: N. Bonneville-Troutdale No. 2 Access Road Water Crossing Improvements

PP&A No.: 6888

Project Manager: Andrew Young – TEPL-CSB-2

Location: Clark and Skamania Counties, WA

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

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to improve four water crossing features and to widen the access road to accommodate the water crossing improvements.

BPA owns and operates the N. Bonneville-Troutdale No. 2 high voltage transmission line, which runs from the N. Bonneville Dam Powerhouse in Skamania County, WA to Troutdale Substation in Multnomah County, OR. The transmission line is 230 kV and supported by steel lattice towers. Near line mile 9, the line merges with the right-of-way corridor with BPA's McNary-Ross No. 1 transmission line. The transmission line is serviced by a series of compacted gravel access roads that allow BPA's transmission line maintenance crews to inspect the line and perform routine and emergency maintenance.

In an access road located in line mile/structure number 5/3, as the line heads west from N. Bonneville dam, the existing road impounds a small pond and is bordered on the other side by a wetland. During periods of high run-off, the pond overtops the road, creating a risk of erosion and road failure. BPA is proposing to install a culvert system that would effectively maintain the pond's level and install a spill-way in the case of overflow. The culvert system would include a vertical outlet control structure in the pond draining into a culvert running underneath the road and outfalling into the wetland. The road would also be widened over the distance of approximately 40 feet to extend two to four feet into the wetland area to provide safer access for transmission line maintenance vehicles.

At another location, in line mile/structure number 16/1, a ford would be improved on an existing access road that crosses a small drainage of a nearby wetland. The ford would consist of well graded streambed material to maintain existing aquatic life-passage at the crossing.

At line mile/structure number 16/4, two existing culverts that do not meet fish passage criteria would be removed and replaced with two steel pre-fabricated bridges that would span the current channels of the waterway. The work would be completed using industry standard equipment including an excavator, backhoe, blader, compactor, and light duty trucks. Work would be completed during the in-water work window for each respective waterway. Work areas would be isolated prior to in-water work using coffer dams and other methods, and aquatic life would be cleared prior to ground disturbance.

Disturbed soils would be seeded and stabilized upon project completion and the sites would be monitored to ensure post-construction restoration goals are met.

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. [1]

/s/ *Aaron Siemers*
Aaron Siemers, EPR-4
Physical Scientist (Environmental)

Concur:

/s/ *Katey C. Grange*
Katey C. Grange
NEPA Compliance Officer Date: *September 5, 2025*

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 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: N. Bonneville-Troutdale No. 2 Access Road Water Crossing Improvements

Project Site Description

The project is located in the Western Cascades Lowlands and Valleys ecoregion, which is characterized by forests of Douglas fir and western hemlock and mountainous terrain with steep ridges and narrow valleys, along the southern edge of the State of Washington in Skamania and Clark counties, in the Columbia River Gorge area.

The project is located at four locations within or near the N. Bonneville-Troutdale No. 1 high voltage transmission corridor, identified by the line mile and structure number of the transmission line. At the 5/3 location, an existing BPA access road is flanked by a small pond and a wetland area. The 5/3 work location drains into an unnamed tributary to Woodward Creek, which drains to Hamilton Creek and then the Columbia River. The small-impounded pond, which is man-made, contains native fish including cutthroat trout. No ESA-listed fish are present. A portion of the project area is owned and managed by the U.S. Forest Service (USFS), Columbia Gorge National Scenic Area office (CRGNSA). The site is located in the CRGNSA, with SMA and GMA designations.

At the 16/1 location, the BPA access road runs down the managed transmission corridor, with wetlands adjacent to the dirt and gravel two-track road. Adjacent land use is private, forested, rural residential and the property is privately owned. At the 16/4 work sites, two small, non-fish bearing tributaries to Cougar Creek cross the BPA access road in two, undersized culverts. The underlying land is managed by the Washington State Department of Natural Resources (WA DNR). At the 16/1 and 16/4 locations, the wetland and unnamed waterways drain into an unnamed tributary to Cougar Creek, which drains into the Washougal River. The 16/1 and 16/4 work areas are not located in the CRGNSA.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The project was evaluated for historic and cultural resources within the context of the larger North Bonneville-Troutdale No. 2 Insulator, Hardware, and Fiber Replacement Project (BPA CR Project No.: WA 2021 133, BPA CX dated May 25, 2022).

Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act, BPA developed an Area of Potential Effects (APE) and initiated consultation on April 19th, 2021, with the Washington Department of Archaeology and Historic Preservation (DAHP), Washington Department of Natural Resources (WA DNR), the U.S. Forest Service Columbia River Gorge National Scenic Area, the Nez Perce Tribe, the Umatilla Indian Reservation, and the Confederated Tribes and Bands of the Yakama Nation. All of the responses concurred with the APE, however, an intensive archaeological survey was

requested. BPA conducted background research utilizing the Washington DAHP's online Washington Information System for Architectural and Archaeological Records Data (WISAARD) database followed by an intensive field survey of the APE. BPA determined that the project would result in no adverse effect to cultural resources. DAHP concurred on January 27th, 2022 (log number 2021-04-02292-BPA) and the Columbia River Gorge National Scenic Area concurred on February 18th, 2022. No other consulting parties responded within 30 days of consultation.

2. Geology and Soils

Potential for Significance: No

Explanation: Excavation would not occur at a depth or scale that would significantly impact local geology and soils. All work would occur in or immediately adjacent to the existing BPA access road system. Excavation activities at each project location would be limited to the existing road prism and fill material, and those immediately adjacent areas.

Notes:

- Disturbed soils would be stabilized by rock or erosion and sediment control best management practices, including mulch and native grass seed, to minimize erosion and sedimentation.

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

Potential for Significance: No

Explanation: Plants in the project area include common grasses, forbs and shrubs of the Pacific Northwest. Proposed road work and stream crossing improvements would disturb those plants immediately in the work area and at locations like staging areas and turn-outs. However, impacts would not be significant due to the limited work area footprint of the proposed action, which occurs on BPA's access roads and immediately adjacent to those existing roads.

To assess potential project effects to species protected under the Endangered Species Act (ESA), BPA obtained an official species list from the U.S. Fish and Wildlife Service on August 21, 2025. No ESA-protected plants or habitat is present in the project area. No state-listed sensitive plants are documented in the project area.

Notes:

- Disturbed soils would be stabilized with mulch and native grass seed at project completion.

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

Potential for Significance: No

Explanation: Common local wildlife such as birds, small mammals and deer in the vicinity of the project area may be disturbed by proposed actions. However, the surrounding landscape provides ample cover and habitat for those animals that may be displaced. The project would occur during the in-water work period; late summer and early fall, outside of the nesting bird season. All work would occur in and near transmission line corridor and existing access roads.

To assess potential project effects to species protected under the ESA, BPA obtained an official species list from the U.S. Fish and Wildlife Service on August 21, 2025. BPA determined that the project would have "No Effect" to ESA-protected wildlife and insects listed in southern Washington.

No state-listed sensitive plants are documented in the project area.

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

Potential for Significance: No with Conditions

Explanation: Project activities may temporarily impact water quality, as the stream crossing improvements would involve excavation in and near unnamed small waterways and a pond. However, with the implementation of best-management practices, including work area isolation, fish salvage, erosion and sediment controls, and conducting all work within the in-water work window, potential impacts to water quality would be insignificant.

To comply with the Clean Water Act, BPA conducted a delineation of the wetlands and waterways in the project area to determine jurisdictional status and obtained permits under Section 404 of the Clean Water Act (NWS-2024-764) as well as a Section 401 Water Quality Certification to authorize the proposed actions in waters of the United States and State of Washington.

Native fish, including cutthroat trout are present in the small pond located at the 5/3 work area. The pond level would need to be temporarily lowered to complete the planned work. The work area would be isolated to the extent possible during construction, and a professional fish biologist would be present during de-watering activities to ensure impacts to native fish are minimized. Any minor instream turbidity generated during project construction would not be at a concentration that would cause an effect to any downstream ESA-listed fish species.

Culvert removal and bridge installation at the 16/4 work locations, as well as the ford improvement at 16/1, would improve the existing crossings to meet current aquatic-life passage criteria. For the 16/4 crossings, the culvert removal and bridge installation would also increase the habitat and water quality functions of the crossings and lower the risk of catastrophic culvert failure and blow-out into the waterway.

None of the proposed work is located in a floodplain, and no federal or state special status species or habitats are present.

Notes:

- Implement the permit terms of the Section 404 Clean Water Act Permit and the Section 401 Water Quality Certification during construction activities.
- All in-water work would occur during the established in-water work period for the waterways.
- Fish and aquatic life salvage and work area isolation measures would be completed prior to ground disturbance and in-water work in those locations with flowing water at the time of construction.
- Implement erosion and sediment control best-management practices during construction and post-construction to stabilize disturbed soils near the waterways.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: Wetlands are located adjacent to the access road at the 5/3 project location and at the 16/1 ford improvement location. The project has proposed impacts to wetlands at both locations. Proposed wetland impacts are immediately adjacent to the existing BPA access road and are associated with re-establishing or widening the road to safely accommodate BPA transmission line maintenance vehicles. In total, the project would permanently impact approximately 1300 square feet of wetlands, with approximately 500 square feet of temporary impacts also proposed, with mitigation measures in place such as limiting the work area as much as possible and reducing the risk of inadvertent impacts to wetlands, impacts to wetlands would be insignificant.

To comply with the Clean Water Act, BPA conducted a delineation of the wetlands in the project area to determine jurisdictional status and obtained permits under Section 404 of the Clean Water Act as well as a Section 401 Water Quality Certification to authorize the proposed impacts to wetlands and waters of the United States and State of Washington. The project was permitted under a Section 404 Nationwide Permit 14, Linear Transportation Project.

Notes:

- Implement the permit terms of the Section 404 Clean Water Act Permit and the Section 401 Water Quality Certification during construction activities.
- All in-water work would occur during the established in-water work period for the waterways.
- Fish and aquatic life salvage and work area isolation measures would be completed prior to ground disturbance and in-water work in those locations with flowing water at the time of construction.
- Implement erosion and sediment control best-management practices during construction and post-construction to stabilize disturbed soils near the waterways.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Excavation would not to be a degree or depth that would encounter groundwater or potentially impact aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The 5/3 work location is located in the Columbia River Gorge National Scenic Area (CRGNSA) managed by the U.S. Forest Service. Coordination with the CRGNSA occurred within the context of the larger North Bonneville-Troutdale No. 2 Insulator, Hardware, and Fiber Replacement Project (BPA CX dated May 25, 2022). BPA coordinated with the USFS CRGNSA office on May 11, 2021. BPA received a response from the CRGNSA on May 26, 2021, confirming agreement that the work would be consistent with the BPA Savings Provision of the CRGNSA. Additional coordination occurred in August of 2025 to update USFS CRGNSA on proposed work in the Scenic Area, with confirmation of compliance on August 26, 2025. No recreational impacts would be expected as a result of the project as the project does not occur near commonly used recreational areas.

9. Visual Quality

Potential for Significance: No

Explanation: The proposed work would be consistent with the visual character of the existing road prism and access roads. Installed bridges would be low profile and not readily visible from key viewing areas. Overall, upgraded stream crossings at the proposed project locations would not significantly alter the existing visual quality.

10. Air Quality

Potential for Significance: No

Explanation: Minor air quality impacts associated with vehicle and heavy equipment use and dust generation would occur during project implementation. However, impacts would be temporary and limited by the scope of the project, and therefore insignificant.

11. Noise

Potential for Significance: No

Explanation: Noise would occur associated with vehicle and heavy equipment use. However, impacts would be temporary and limited by the scope of the project, and therefore insignificant.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA and BPA's contractors would develop and implement a site-specific safety plan during construction to reduce risks to human health and safety. Overall, improved access roads would reduce risk to transmission line maintenance crews and other users of the BPA access road 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: BPA has coordinated proposed project activities with underlying land managers and private owners, including the USFS Columbia River Gorge National Scenic Area office, and the Washington Department of Natural Resources. Further coordination would continue into the construction phase of the project, as needed.

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

Signed: /s/ *Aaron Siemers*
Aaron Siemers
Physical Scientist (Environmental)

Date: *September 5, 2025*