

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: North Bonneville-Ross No. 1 Culvert Replacement

Project No.: WA 2024 108

Project Manager: Ariel Kramer - TELF-TPP-3

Location: Clark County, WA

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

Description of the Proposed Action: Bonneville Power (BPA) proposes to repair and improve the access road water crossing feature south of BPA's fee-owned right-of-way (ROW) on North Bonneville-Ross No. 1 transmission line in Clark County, WA. BPA's actions would include removing three failing culverts, installing a box style cement culvert with a steel bridge, and improving the access road to accommodate the proposed water crossing features and maintain the function of the access road.

The project would consist of constructing a temporary stream bypass around the worksite, removal of residential fencing located above and around the existing culverts, regrading and sloping the streambed, installing riprap on excavated stream banks, and filling the downstream scour hole using stream material. Bridge installation would include excavation of the three culverts and surrounding fill, installation of compacted granular rock fill for bridge footings and placement of precast bridge segments.

Work would be completed using industry standard equipment including a large crane, excavator, dump truck, backhoe, blader, compactor, light duty trucks, and powered hand tools. Work would be completed during the in-water work window. Work areas would be isolated prior to in-water work and best management practices (BMPs) involving stabilization, sediment fencing to enclose the disturbed areas, implementing waddles for erosion control during pre and post-construction. Reconstruction of residential fencing and removal of the stream bypass would be completed once construction is finished. Disturbed soils would be seeded and stabilized upon project completion and the site 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

Sylas Daughtrey
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 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 Evaluation

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.

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Project Site Description

The proposed project site is located in Clark County, Washington Township 2 North, Range 3 East, and Section 28. The project area is located approximately 130 feet south of BPA's fee-owned ROW and runs through BPA's right-of-access agreement through a residential property. BPA owns and operates the N. Bonneville-Ross No. 1 transmission line which runs east to west and is adjacent to rural residential properties, forested county property, and is located within the Lacamas Lake watershed. An unnamed non-fish bearing perennial stream runs through the project area and would be subject to the culvert and bridge work. Habitat conditions surrounding the immediate project is dominated by blackberry, canary grass, and scattered sword fern and lady fern.

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 developed an Area of Potential Effects (APE) and initiated consultation on September 3rd, 2025, with the Washington Department of Archaeology and Historic Preservation (DAHP), the Cowlitz Indian Tribe, the Confederated Tribes of Grand Ronde Community of Oregon, and the Confederated Tribes and Bands of the Yakama Nation.

BPA determined that the project would result in no adverse effect to cultural resources. DAHP concurred on October 6th, 2025 (DAHP log number 2025-06-03837). No other consulting parties responded within 30 days of consultation.

2. Geology and Soils

Potential for Significance: No with Conditions

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

Notes:

- Disturbed soils would be stabilized by rock or erosion and sediment control BMPs, including mulch and northwest regional-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 as well as invasive shrubs and vines. 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 be minor due to the limited work area

footprint of about 1,300 square feet (0.03 acres) for 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 May 6, 2025. No ESA-protected plants or habitat is present in the project area.

No state-listed sensitive plants are 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 mammals, birds and deer in the project area may be disturbed by proposed construction actions. Surrounding landscape would provide ample space and habitat if any species were to be temporarily displaced. The project would occur during in-water work period, late summer and early fall, and outside of 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 May 6, 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 an unnamed small waterway. However, with the implementation of best-management practices, including work area isolation, erosion and sediment controls, and conducting all work within the in-water work window, potential impacts to water quality would be minor.

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.

The work area would be isolated to the extent possible during construction. Any minor instream turbidity generated during project construction would not be at a concentration that would cause an effect on any downstream ESA-listed fish species.

Culvert removal and bridge installation would improve the existing crossings to meet current aquatic-life criteria, habitat and water quality functions of the crossings, and lower the risk of culvert failure and blow-out into the waterway and surrounding properties.

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 Section 401 Water Quality Certification during construction activities.
- All in-water work would occur during the established in-water work period for the waterway.
- 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 approximately 250 feet downstream of the access road and culvert replacement. No permanent or direct wetland impacts are proposed during the construction surrounding the existing BPA access road and culvert replacement. Mitigation measures during construction would be implemented such as limiting the work area to reduce the risk of inadvertent impacts to downstream wetlands.

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.

Notes:

- Implement the permit terms of the Section 404 Clean Water Act Permit and Section 401 Water Quality Certification during construction activities.
- All in-water work would occur during the established in-water work period for the waterways.
- 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 monitoring and best-management practices during construction and post-construction to stabilize disturbed soils near the waterway which would include but not be limited to, sediment fencing, waddles, and proper rocking to/from entrance of project area to prevent soil tracking.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Excavation would not be to 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 proposed work is located on private residential lands. BPA has acquired right-of-access rights across the residential property to access BPA's adjacent ROW. No changes to land use or specially-designated areas would change once construction is completed. Access road conditions across the property would improve after project completion.

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. Bridge installation would be low profile and not readily visible from key viewing areas. Overall, the upgraded stream crossing at the proposed project location would not 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 during daylight hours only. However, impacts would be temporary and limited by the scope of the project,

and therefore insignificant. BPA has coordinated with the underlying landowner, who is aware of the project and potential noise generation.

12. Human Health and Safety

Potential for Significance: No

Explanation: BPA and BPA's contractors would develop and implement a site-specific safety plans 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 with the underlying landowner. Additional coordination regarding construction timing and duration would be conducted with the underlying and surrounding residential 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:

Sylas Daughtrey
Environmental Protection Specialist