

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: St Clair-South Tacoma 4/4 urgent tower repair

PP&A No.: 6961

Project Manager: James Barnhart – TEPL-TPP-1

Location: Thurston County, 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 replace a damaged steel lattice tower leg that occurred as a result of an automobile collision. BPA crews constructed a temporary wood pole structure to move the weight of the conductor off the damaged steel tower. Once a new tower leg could be fabricated, BPA crews would remove the damaged tower leg and replace it with a new one. The conductor would then be transferred back to the steel tower from the wood pole structure, which would then be removed. Typical equipment for this type of work includes a boom truck, bucket truck, pole truck, and crew trucks.

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/ Jonnel Deacon

Jonnel Deacon
Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange
NEPA Compliance Officer

Date: December 16, 2025

Attachment(s): Environmental Evaluation

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 evaluation 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 project is located in the southern portion of Puget Sound in Washington State. The area is at the edge of an uncontrolled training area on Joint Base Lewis-McCord (JBLM). The area surrounding the project site is mostly forested with the soil being mostly glacial till.

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 Nisqually Indian Tribe and the Washington State Department of Archaeology and Historic Preservation (DAHP) on November 12, 2025. DAHP concurred with the APE and the determination of no adverse affect to historic properties on November 18, 2025, and no other responses were received.

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 removal and tower leg replacement. Standard construction erosion control measures would be utilized as necessary to reduce the potential for soils to leave workspaces.

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

Potential for Significance: No

Explanation: Minimal vegetation disturbance associated with crushing and excavating 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, temporary 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.

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 vegetated distance to the nearest waterbody (over 0.5 miles) would ensure that sedimentation would not enter into any water body.

6. Wetlands

Potential for Significance: No

Explanation: No wetlands are documented within the project area. No impacts to wetlands are anticipated.

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, which would not intersect groundwater.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in or disruption to land use would occur. The area is on JBLM property, but immediately adjacent to a public roadway and is not routinely used for military purposes.

9. Visual Quality

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of the tower leg 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 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: JBLM access control has been notified of the proposed project. When an outage date is scheduled, it will be passed on to JBLM staff along with a list of all BPA staff who will be on site during construction.

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: December 16, 2025

Jonnel Deacon
Physical Scientist (Environmental)