

## Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



**Proposed Action:** FY26 Expedited Priority Poles Traditional Construction Method

**PP&A No.:** 6963

**Project Manager:** Alla Kirsanova – TEPL-TPP-1

**Location:** Multiple counties, Oregon and Washington

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

**Description of the Proposed Action:** Bonneville Power Administration (BPA) is proposing to replace multiple deteriorating wood pole structures and associated hardware at specific locations in multiple BPA districts. The structures proposed for replacement are listed in attachment 1. For all structures, the work would include removing the existing wood pole structures and replacing them in or near the same holes. Trucks and equipment would be staged in work areas about 50 feet by 50 feet at each of the structure replacement locations. Some minimal ground disturbing work may be necessary to improve and level landings. Only rubber-tired vehicles would be used, no tracked vehicles would be allowed. No helicopter use would be required. Fire wraps would also be added where appropriate.

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.

/s/ Jonnel Deacon  
Jonnel Deacon  
Physical Scientist (Environmental)

Concur:

/s/ Katey Grange  
Katey C. Grange Date: January 16, 2026  
NEPA Compliance Officer

### Attachment(s): Environmental Evaluation

Attachment 1. List of proposed structures to be replaced.

Maintenance Headquarters	Line Name	Mile	Structure
Alvey	Alvey-Martin Creek No 1	22	6
Alvey	Cougar-Holden Creek No 1	13	1
Alvey	Cougar-Holden Creek No 1	26	6
Alvey	Eugene-Alvey No 2	11	5
Alvey	Lookout Point-Alvey No 1	8	1
Alvey	Lookout Point-Alvey No 1	8	2
Alvey	Lookout Point-Alvey No 1	8	5
Chehalis	Chehalis-Mayfield No 1	6	7
Chehalis	Chehalis-Mayfield No 1	6	9
Chehalis	Chehalis-Mayfield No 1	17	1
Chehalis	Mossyrock-Chehalis No 1	27	10
Chehalis	Naselle-Tarlett No 1	11	3
Ellensburg	Grandview-Red Mountain No 1	5	7
Ellensburg	Grandview-Red Mountain No 1	6	4
Ellensburg	Grandview-Red Mountain No 1	7	8
Ellensburg	Grandview-Red Mountain No 1	7	10
Grand Coulee	Grand Coulee-Okanogan No 2	19	5
Grand Coulee	Grand Coulee-Okanogan No 2	19	6
Grand Coulee	Grand Coulee-Okanogan No 2	20	4
Grand Coulee	Grand Coulee-Okanogan No 2	20	5
Grand Coulee	Grand Coulee-Okanogan No 2	21	5
Grand Coulee	Grand Coulee-Okanogan No 2	21	9
Grand Coulee	Grand Coulee-Okanogan No 2	21	10
Grand Coulee	Grand Coulee-Okanogan No 2	29	6
Grand Coulee	Grand Coulee-Okanogan No 2	31	5
North Bend	Fairview-Bandon No 1	2	4
North Bend	Fairview-Bandon No 1	6	1
North Bend	Reedsport-Fairview No 1	5	6
Olympia	Olympia-Shelton No 1	2	4
Olympia	Olympia-Shelton No 1	2	8
Olympia	Olympia-Shelton No 1	3	2
Olympia	Olympia-Shelton No 1	15	3
Olympia	Olympia-Shelton No 1	18	5
Olympia	Olympia-Shelton No 2	18	1
Olympia	Olympia-Shelton No 2	18	2
Olympia	Olympia-Shelton No 2	18	4
Olympia	Olympia-South Elma No 1	15	6
Olympia	Olympia-South Elma No 1	17	9
Olympia	Port Angeles-Sappho No 1	15	4
Olympia	Satsop Park-Cosmopolis No 1	7	7
Ross	Ross-Vancouver Shipyard No 1	4	8
Snohomish	Snohomish-Bothell No 1	2	1
Snohomish	Snohomish-Bothell No 1	5	4

# 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.

## Proposed Action: FY26 Expedited Priority Poles Traditional Construction Method

### Project Site Description

Structures being replaced are in a variety of environments across the northwest. All work would occur within existing, maintained transmission rights-of-way on private and public lands.

### 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 Confederated Tribes and Bands of the Yakima Nation, the Confederated Tribes of Grand Ronde, the Confederated Tribes of Siletz Indians, the Cowlitz Indian Tribe, the Tulalip Tribes, the Snoqualmie Indian Tribe, the Confederated Tribes of the Chehalis Reservation, the Lower Elwha Klallam Tribe, the Nisqually Indian Tribe, the Quinault Indian Nation, the Shoalwater Bay Tribe, the Squaxin Island Tribe, the Confederated Tribes of the Colville Reservation, Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, the Coquille Indian Tribe, United States Bureau of Land Management – Umpqua Field Office (BLM), the Washington State Department of Natural Resources (WDNR), the United States Fish and Wildlife Service, the Colville Tribal Historic Preservation Office, the Oregon State Historic Preservation Office (SHPO), and the Washington Department of Archaeology and Historic Preservation (DAHP) between November 13, 2025 and December 12, 2025. DAHP concurred with the APE and the determination of no adverse effect on November 18, 2025, and SHPO concurred with the APE and determination of effects on December 12, 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 near the previously-excavated hole would occur during wood pole replacement. Standard construction erosion control measures would be utilized as necessary.

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

Potential for Significance: No

Explanation: Minimal or no disturbance to vegetation is anticipated. If vegetation would be impacted, it would be crushed in place. 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 impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise and human presence over a short period of time. 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 would not impact water bodies that support resident, anadromous, or ESA-listed fish. Erosion control best management practices combined with the distance to the nearest waterbody would ensure that sedimentation would not enter into any water body.

#### **6. Wetlands**

Potential for Significance: No

Explanation: Structure replacements would occur within suspected wetlands and about 0.5 acres of wetlands would have vegetation crushed to safely set up equipment for pole installation. About 400 square feet of wetlands would have permanent fill associated with pole replacement. All wetland impacts would be consistent with the Clean Water Act and permitted through a Nationwide Permit. All permit requirements would be implemented. Pole wraps would be installed to prevent wood pole preservative from entering the environment. No access road work or landing work is proposed in wetlands. Crews would utilize wetland mats in the event that roads or landings are not adequate.

#### **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, except in wetland areas. As described in #6 above, pole wraps and the implementation of Clean Water Act permit requirements, including spill prevention, would reduce limit potential groundwater contamination.

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

Potential for Significance: No

Explanation: No change in land use would occur and there would be no temporary disruption to the use of public lands during pole replacement. 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 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: All activities have been coordinated with land managers and 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*

Jonnel Deacon

Physical Scientist (Environmental)

Date: *January 16, 2026*