

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Access Road Bridge Replacements Near Structures 96/3 and 97/3 on the Chief Joseph-Monroe No. 1 Transmission Line

**Project Manager:** Donna Martin, TELF-TPP-3

**Location:** King County, Washington

**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 two temporary access road bridges located near structures 96/3 and 97/3 of the Chief Joseph-Monroe No. 1 Transmission Line. Two new 16-foot by 60-foot-long permanent bridges would be installed to assure safe and reliable access for BPA's transmission line maintenance crews accessing BPA's rights-of-way (ROW). The total area of disturbance is a combined 3,575 square feet (less than 0.1 acre).

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)).

At the first bridge site near structure 96/3 on 682nd Avenue NE in Grotto, WA, the existing gravel access road would be excavated using a large excavator to expose a temporary 40-foot-long bridge. This temporary bridge, along with its concrete eco-block supports, would be removed with a crane onto a flatbed truck for offsite disposal or storage at a BPA substation. A new 60-foot-long permanent steel bridge with concrete abutments, would be installed. New concrete abutments approximately 2 feet wide, 2 feet tall, and 16 feet long would be set on a 2-foot base of crushed surfacing rock and riprap about 2 feet in diameter placed around each abutment to a depth of 2 feet. The access road approaches would be regraded, rocked, and compacted. The new bridge would include a pre-installed conduit pipe to house upgraded water and electric lines from the local water utility district, who would conduct their upgrades after the installation of the new BPA bridge.

At the second bridge site near structure 97/3, a similar construction sequence using the same equipment would be followed. The existing unnamed gravel access road would be excavated to expose the 40-foot-long temporary bridge, which would then be removed along with its concrete eco-block abutments and anchors for offsite disposal or storage. A new 60-foot-long permanent steel bridge would be installed, requiring local excavation around existing abutments and within the access road to accommodate its extended length and final alignment. New concrete abutments (2 feet wide, 2 feet tall, and 16 feet long) would be installed approximately 60 feet

apart, with 2:1 slopes cut back from the abutments down to the Ordinary High Water Mark (OHWM) although no riprap would be necessary. Steel girders would be installed, welded, and the new bridge secured in place before the road is regraded to match its driving surface. Excavated materials would be side-cast or stockpiled at designated graveled staging areas within the transmission ROW or adjacent to the access road.

To provide clearance for crane movement and vehicle access, several bigleaf maple trees and some shrubby vegetation would need to be removed near the bridge replacement sites. Disturbed areas would be reseeded with a native seed mix and replanted following construction. Construction activities and riprap placement would remain in upland areas above the OHWM. Best Management Practices (BMPs) would be implemented to control sediment, and construction would occur during the dry season when stream flows are low to further reduce the risk of sediment entering the streams. The new bridges would be designed to prevent stormwater runoff from flowing directly into the streams.

**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 the current *DOE National Environmental Policy Act (NEPA), Implementing Procedures*, 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.

Jeff Maslow  
Senior Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

# 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:** Access Road Bridge Replacements Near Structures 96/3 and 97/3 on the Chief Joseph-Monroe No. 1 Transmission Line

## **Project Site Description**

The project involves activities at two locations near the Chief Joseph-Monroe No. 1 Transmission Line in King County, Washington. The location near structure 96/3 is a BPA easement along a public road surrounded on both sides by private landowners. The location near 97/3 is on National Forest System lands on the Mt. Baker Snoqualmie National Forest. The general area is characterized by a landscape transitioning from forested uplands to riparian corridors with nearby residences in Grotto along US Highway 2. Dominant vegetation includes mixed forests featuring species such as western redcedar, western hemlock, and bigleaf maple, interspersed with shrubby undergrowth. The roads are sparsely used for access to the transmission line and local landowners. Some areas show evidence of past disturbances, including fire and the presence of non-native plant species. Both waterbodies under the bridges are known to bear fish, including ESA-listed Puget Sound Chinook salmon and steelhead, as well as bull trout, although the stream under the bridge location at 97/3 flows seasonally and is typically dry during the summer months.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

**Explanation:** On December 13, 2024, BPA shared its determination of No Historic Properties Affected with the Confederated Tribes of the Colville Reservation, Lummi Nation, NookSack Indian Tribe, Samish Indian Nation, Sauk-Suiattle Indian Tribe, Spokane Tribe of Indians, Stillaguamish Tribe of Indians, Swinomish Indian Tribal Community, Tulalip Tribes, Upper Skagit Indian Tribe, the Confederated Tribes and Bands of the Yakama Nation, Mt. Baker-Snoqualmie National Forest, Okanogan-Wenatchee National Forest, and the Washington Department of Archaeology and Historic Preservation (WA DAHP).

On December 16, 2024, WA DAHP concurred with BPA's determination of effect, and on December 19, 2024, the Spokane Tribe of Indians Historic Preservation Office concurred. On January 30, 2025, the 30-day comment period expired with no other comments received from the consulting parties, concluding the National Historic Preservation Act section 106 consultation process.

After completing the section 106 consultation process, BPA received a comment from the Snoqualmie Tribe requesting information on the archaeological review conducted for the proposed action. BPA responded by providing the Area of Potential Effect, BPA's Determination of Effect memorandum, and DAHP's concurrence memorandum, extending the opportunity for the Tribe to comment on the consultation record.

#### **Notes:**

- If construction crews encounter cultural material during project implementation, then BPA will follow its Inadvertent Discovery Protocol and halt work in the vicinity of the finds until further inspection and assessment in consultation with the appropriate consulting parties.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: The project area primarily consists of Kaleetan sandy loam, till substratum, 8 to 30 percent slopes, which comprises the entirety of the 97/3 bridge area and a portion of the 96/3 bridge area. This is a well-drained soil. The remainder of the 96/3 bridge area has Rober loam, 0 to 30 percent slopes, and a moderately well-drained soil. Best management practices (BMPs) would be implemented including reseeding disturbed areas to reduce the likelihood of erosion and the potential for soil to migrate offsite. Therefore, impacts on geology and soils would be low.

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

Potential for Significance: No with Conditions

Explanation: Several bigleaf maple trees would be removed as well as shrubby vegetation to provide clearance for construction vehicles and equipment. In addition, placing soil fill material and riprap would remove some riparian vegetation. BPA conducted surveys that evaluated general plant types and communities in the project in 2025 as part of the wetland delineation and did not identify federally listed plant species or habitats in the project area. Based on these survey results and a desktop review of special-status plant occurrences, BPA determined that the project would have no effect on sensitive or ESA-listed plant species. In addition, implementation of vegetation-related BMPs such as clean construction equipment, vehicles, clothing and boots to reduce the likelihood of relocating weeds and plant materials would be implemented. BPA would revegetate affected areas with regionally appropriate native seed mixes to ensure that anticipated impacts to plants would be low.

Notes:

- Revegetate disturbed areas with a native seed mix following construction and replant the same number of native trees removed from within 150 feet of the streams to compensate for their removal consistent with the National Marine Fisheries Service SLOPES Programmatic Biological Opinion (NMFS SLOPES Programmatic BiOp).
- Restrict construction activities to the minimum required work area while meeting necessary construction and safety requirements to limit the extent of disturbance to riparian plants.
- Any vehicles, tools, or heavy equipment used for ground disturbing work must be washed of soil and plan material prior to arrival on site and before leaving to reduce the spread of weeds.
- Construction workers will ensure that all construction equipment and workers' boots are free and clean of mud carried from offsite locations to reduce the potential introduction of noxious or invasive plant species.
- Any imported material including rock used for riprap must be inspected and certified for weeds prior to being brought onsite, and any straw, hay, or mulch must come from a source certified by the Washington Weed Free Hay and Mulch Program. No topsoil or compost would be imported for use within floodplain or riparian areas.
- Work from lightly infested to highly infested weed areas or from high elevation to low elevation to further reduce the spread of weeds.

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

Potential for Significance: No with Conditions

Explanation: The project area is near an existing highway and on the edge of a small town with human presence and associated noise, so the construction would not introduce a major new source of disturbance that would permanently displace wildlife. Some individuals may experience disturbances and temporary displacement resulting from noise and human presence during construction.

For ESA-listed species and designated critical habitat in the project area for marbled murrelet and Northern spotted owl, BPA initiated informal consultation with the US Fish and Wildlife Service regarding potential effects. Only the bridge near structure 97/3 sits within designated critical habitat for both marbled murrelet and Northern spotted owl. BPA concluded that the bridge replacements may affect, but not adversely affect individuals of these species because there is not suitable habitat sufficiently close to the project area

such that they would experience adverse effects; and adverse modification to their designated critical habitat would not occur because the trees and shrubby vegetation that would need to be removed do not provide suitable old-growth habitat.

Notes:

- Daily dawn/dusk timing restrictions would be in place to avoid disturbing marbled murrelet. Project activities would be limited to two hours after official sunrise and two hours before official sunset.

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

Potential for Significance: No with Conditions

Explanation:

Relying on the OHWM delineations and survey data, BPA designed the proposed bridge replacements and associated riprap and fill material to avoid any direct impact below the OHWM for both streams. In addition to designing the bridges to avoid permanent impacts below OHWM, to avoid temporary impacts to project-area waterbodies and fish, construction efforts would also adhere to strict erosion-control protocols and utilize clearly marked OHWM boundaries to keep all construction activities, fill, and riprap entirely above the OHWM and thereby avoiding direct disturbance and fill within the wetted channel and aquatic habitats. On this basis, BPA determined that no Clean Water Act permit would be necessary to obtain. The project would affect some riparian vegetation due to soil disturbance and rocking along the road landing and bridge abutments above OHWM.

The only temporary, short-duration disturbance below OHWM would result from construction workers standing at or below the OHMW to use a chainsaw to remove the old bridge crossing for the 96/3 bridge; however, this work would not occur within the wetted channel and be limited to the minimum number of workers necessary to safely complete the work. Further, the old bridge would be wrapped in material, to the extent practicable, to prevent debris from entering the stream. Implementing these BMPs outlined above to avoid permanent impacts from fill within jurisdictional waters and to mitigate the risk of temporary impacts from the presence of construction workers in the wetted channel and potential sediment releases would ensure potential effects remain at a low level.

Project-area streams are likely accessible to fish species found in the Skykomish River such as ESA-listed Puget Sound Chinook and steelhead, and bull trout, while other salmonids such as coho, chum, and pink salmon are also present. To avoid and minimize effects to these fish species, the bridge designs conform to the standards in the National Marine Fisheries Service (NMFS) SLOPES Programmatic Biologic Opinion (BiOp), which meets both NMFS and Washington Department of Fish and Wildlife (WDFW) standards for fish passage to avoid and minimize effects to ESA-listed salmon and steelhead. NMFS reviewed the proposed action for consistency with the Programmatic BiOp and concurred that the action meets all BiOp conditions on February 23, 2026. In addition, BPA consulted with the U.S. Fish and Wildlife Service for potential effects to bull trout relying on the many of the same avoidance and minimization measures outlined in SLOPES and WDFW standards, and received a concurrence from the Service on BPA's Not Likely to Adversely Effect Determination on February 25, 2026.

Notes:

- The OHWM would be flagged and no equipment, personnel, or ground disturbance would occur within the flagged area with limited exceptions for bridge removal during the WDFW in-water work window. No riprap, fill material, or cut slopes would be permitted below the OHWM.
- For cranes, excavators, and mechanized equipment working within 150 feet of the stream, biodegradable hydraulic fluids would be used instead of petroleum-based products, and stationary heavy equipment that is operated, maintained, or stored within that distance of the streams would be protected to prevent any leak or spill from entering the water.
- Before rigging the existing bridge to a crane, loose parts would be removed and the bridge would be wrapped to prevent materials from falling into the stream.

- Sediment and erosion control structures (e.g. silt fences, wattles, etc.) would be installed prior to ground disturbance and would be monitored and maintained throughout the duration of the Project to ensure no sediment-laden water enters the stream.
- On cut slopes, sediment and erosion controls would remain in place until vegetation is successfully reestablished. Once revegetation is successful, sediment and erosion control structures would be removed.

## 6. Wetlands

Potential for Significance: No

Explanation: BPA conducted wetland surveys in the summer of 2025. These surveys revealed that multiple wetlands are found near the 96/3 bridge and none occur near the 97/3 bridge. Because these wetlands identified near the 96/3 bridge sit outside the area affected by project impacts and no wetlands are present near the 97/3 bridge, there would not be any impact to wetlands from either bridge.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No areas of shallow groundwater or aquifers are known to exist within the project area. Subsurface work would be limited to excavating the abutments of the old bridge. No hazardous materials beyond fuels and oils used in construction equipment would be used for the project, and spill remediation materials would be stored at the construction site to quickly contain any releases of oil or gas. Therefore, the proposed action would have no impacts to groundwater or aquifers.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Because the project would occur within King County, it is subject to the Coastal Zone Management Act. Therefore, BPA's proposed action must demonstrate consistency with enforceable coastal zone management policies of Washington state. To that end, BPA prepared a consistency determination and submitted it to the Washington State Department of Ecology on January 30, 2026, concluding that the project would be conducted in a manner consistent to the maximum extent practicable with enforceable coastal management policies of Washington state. The Department of Ecology issued a consistency decision concurring with BPA's consistency determination on March 18, 2026. Otherwise, because the proposed action would not change existing land use, it would have no impact on existing land use.

## 9. Visual Quality

Potential for Significance: No

Explanation: The proposed bridge-replacement actions are consistent with the surroundings and would not markedly alter the existing appearance of the bridges and nearby landscape.

## 10. Air Quality

Potential for Significance: No with Conditions

Explanation: Minor and temporary vehicle and construction equipment emissions and fugitive dust would occur during construction. No new sources of emissions are anticipated once the project is constructed. Therefore, impacts to air quality are expected to be low.

Notes:

- Crews would take reasonable precautions to prevent fugitive dust from becoming airborne such as watering disturbed areas, covering soil stockpiles, and limiting vehicle speeds.
- Ultra-low sulfur diesel would be used.

## 11. Noise

Potential for Significance: No with Conditions

Explanation: Minor and temporary vehicle and construction noise would occur during construction. Construction work would be limited to daytime hours during the work week to reduce noise perceptible to nearby residents or other receptors. Construction noise would only last for the duration of construction, which is anticipated to last about two or three weeks. Therefore, impacts to noise quality are expected to be low.

Notes:

- Operate construction equipment during normal work hours (e.g., 8-6PM) on weekdays.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: One neighboring resident near the 96/3 bridge would have reduced access to Grotto and Highway 2 during construction. This impact would be limited in duration, expected to last no more than a couple of days, when the existing temporary bridge would be removed to facilitate installation of the new bridge. Emergency access to Grotto and Highway 2 would still be possible through the BPA transmission-line corridor. Contractors would follow BPA and OSHA safety standards. The project would not introduce any other safety hazards or use materials that could threaten human health and safety. The utility line providing service to Grotto would not be affected by the construction and would be relocated by the local utility at a later date. Therefore, after following the BMP identified below, the project would have a low impact to human health and safety.

Notes:

- Post signage and notify affected residents to indicate the day(s) that the existing bridge is expected to be removed so that they can identify alternative access and make the necessary arrangements.

### **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: In August 2025, BPA conducted a site visit with a representative from the Town of Grotto to coordinate the design and planning of the project to ensure uninterrupted utility service to the town of Grotto on a long-term basis after the 96/3 bridge replacement. BPA also coordinated with neighboring landowners in Grotto near the 96/3 bridge regarding the project details including the necessary tree removals. In addition, BPA coordinated with the Mt. Baker Snoqualmie National Forest regarding the 97/3 bridge replacement to gather feedback on the proposed project and incorporate the appropriate BMPs. In addition, the Washington Department of Ecology conducted a public-comment process on BPA's coastal zone consistency determination between February 12 and March 12, 2026.

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

Signed:

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Senior Environmental Protection Specialist