Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy

Proposed Action: Underwood Tap to Bonneville PH1-Alcoa No. 1&2 Insulator Replacement & Reconductor Project

PP&A No.: 6937

Project Manager: Lisa Schmidt – TIPL-TPP-1

Location: Skamania, Washington

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine maintenance; B3.2 Aviation Activities; B4.6 Additions and Modifications to Transmission Facilities; B4.12 Construction of Powerlines; B4.10 Removal of Electric Transmission Facilities

Description of the Proposed Action: BPA proposes to perform several structure and equipment repairs, improvements, and replacements on its 25-mile-long Underwood Tap to Bonneville PH No. 1-Alcoa No. 1 & No. 2 transmission line. The transmission line was constructed in 1963 and is configured as a complex radial-feed line with segments of wood pole, steel pole, and steel lattice structures, as well as single and double circuits. This line is susceptible to unplanned outages, and the aging infrastructure increases the risk of equipment failure, which could be a source of wildfire ignition in certain conditions. Additionally, when emergency repairs are required, transmission linemen risk working in dangerous conditions, such as inclement weather. Furthermore, the transmission structures lack modern safety features to protect transmission line workers when climbing structures. To address these deficiencies, the proposed action would include the following:

- Replace conductors, insulators, and hardware for the length of the project
- Steel member replacements on eight existing steel lattice structures
- Install one prop structure between structure 22/2 and 22/3 to increase ground-to-conductor clearance for safety and reliability.
- Install one prop structure between 25/3 and 25/4
- Replace one structure (6/1) west of Stevenson Substation and install a disconnect switch and two-pole wood structure.
- Install fall protection flanges on approximately 145 existing steel lattice structures
- Install a temporary 211-foot shoo-fly tap at North Bonneville Substation to provide power to customers while the Underwood Tap to Bonneville PH No. 1-Alcoa No. 1 & No. 2 transmission line is out of service
- Construct a permanent 198-foot tie line for sectionalizing the west side using six previously installed emergency wood poles on the west side of Stevenson Substation near structure 6/1
- Construct a permanent 258-foot tie line on the east side of Stevenson Substation (similar construction as the tie line on the west side, described above)
- Replace one disconnect switch and two-pole wood structure at structure 10/1
- Remove one out-of-service switch structure at structure 12/5

- Install approximately 1,600 bird flight diverters over 17 spans that cross probable bird flight paths.

The existing copper conductor would be replaced with a near-equivalent aluminum conductor with a steel core. The new insulators would be similar to the existing insulators and made of porcelain or glass.

The existing conductors would be removed and replaced by reeling the old conductor onto large spools and unreeling new conductor using conventional pulling and tensioning techniques. A small helicopter (Type III e.g., MD500) would be used to assist this process. The conductor pulling/tensioning equipment would be positioned at pulling and tensioning sites located at the beginning and end of each identified pulling section. These sites are used for pulling and tightening the conductor to the correct tension once they are mounted on the transmission line structures. Most of the pulling and tensioning sites would use an area about 250-feet-long by 125-feet-wide either behind or ahead of a structure (about 0.7 acre or up to 1.4 acre if both sides are used).

Temporary staging areas, usually placed outside of the transmission line right-of-way, would be used to store, and stockpile materials, trucks, and other equipment during construction. Four potential temporary staging areas have been identified. Additional staging areas in previously disturbed or cleared areas may be identified during construction. Each staging area would occupy between 0.7 to 4.2 acres, based on the area needed to accommodate steel for the structures, conductor, and other materials.

Seven potential helicopter landing zones have been identified along the line in previously cleared areas. The furthest one is about 0.25 miles from the ROW corridor.

Transmission line structures are currently accessible by existing access roads, located both within and outside of the right-of-way. The access roads that lead to the right-of-way are generally multi-use roads, including residential access roads, county roads, and farm roads. Some access roads are on public lands, including lands managed by the USFS.

In general, the proposed project would cause minor temporary ground disturbances. All work sites would likely be mowed prior to use to prevent the potential for fire ignition. For insulator replacements, conductor replacement, staging areas and helicopter landing zones, minor incidental ground disturbance is anticipated. For insulator and conductor replacements, additional ground disturbance would occur if leveling and grading of the sites is needed to accommodate transmission line construction equipment or pulling and tensioning equipment. For structure installations and replacements, localized excavations and ground disturbance would occur at the structure sites. All temporary disturbances would be restored to approximate pre-construction conditions.

Construction vehicles required for conductor replacement could include a bucket truck, a dump truck, an excavator, cranes, work trucks, and helicopters.

Construction work would be done in phases, over a period of three years. The current schedule calls for shoo-fly lines and tie lines to be constructed in 2026. The rest of the project activities would begin in spring of 2027 for the section between structure 6/2 and 25/4 and conclude in fall of 2028 for the section between structure 1/4 and 6/2.

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/ *Oden Jahn*
Oden Jahn
Physical Scientist (Environmental)

Concur:

/s/ *Katey Grange*
Katey C. Grange Date: *March 23, 2026*
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: Underwood Tap to Bonneville PH1-Alcoa No. 1&2 Insulator Replacement & Reconductor Project

Project Site Description

The existing 25-mile-long, 115-kV Underwood Tap to Bonneville PH No. 1-Alcoa No. 1 & No. 2 transmission line begins at BPA's North Bonneville Substation in North Bonneville, Washington and continues to the east feeding electricity to the communities of North Bonneville, Stevenson, Carson, and Underwood. The project ends at structure 25/4, approximately 0.75 miles west of Bald Mountain Substation near the Skamania/Klickitat County line. The line shares a ROW corridor with the 230-kV North Bonneville-Midway No. 1 line for the majority of its length, and with the 500-kV Knight-Ostrander No. 1 and 345-kV McNary-Ross No. 1 transmission lines for shorter lengths. The line is located mostly on private lands; however, there are sections on United States Forest Service (USFS), Washington Department of Natural Resources lands. Within the Columbia River Gorge National Scenic area (CRGNSA), the project area is in a mix of Urban Areas, various General Management Area land use designations, and Special Management Areas designated as open space and forest.

Land uses in the project area include private timber, agricultural, urban and rural residential, and other undeveloped forests, woodlands, and grasslands. Notable features in the project area include Kidney Lake, Blue Lake, Rock Creek, Wind River, and the Little White Salmon River.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: The proposed actions were found to have no adverse effect to historic properties. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, on September 20, 2021 BPA initiated consultation with: the Cowlitz Indian Tribe, the Confederated Tribes of Grand Ronde, Confederated Tribes and Bands of the Yakama Nation, the Nez Perce Tribe, the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Confederated Tribes of Warm Springs (CTWSRO), the Skamania County Board of Commissioners, the Washington State Department of Archaeology and Historic Preservation (DAHP), the Washington State Department of Natural Resources, and the U.S. Forest Service (Columbia River Gorge National Scenic Area). Following the completion of archaeological investigations and traditional use studies, on February 6, 2026, BPA sent a determination of effects finding to the consulting parties. The DAHP concurred with the BPA No Adverse Effect determination on February 9, 2026. No additional comments or requests for information were received within 30 calendar days.

Project activities are expected to occur within or adjacent to known cultural resources cultural resources, including archaeological sites, traditional use areas, Traditional Cultural Properties (TCPs) and Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSIT) identified during archaeological investigations, review of existing traditional use study reports maintained by the CTUIR, and traditional use study reports completed by consulting Tribes (CTWSRO, the Yakama Nation, and the Nez Perce Tribe) for this project.

Notes: The following conservation measures would be implemented during this project to avoid adverse effects to the identified cultural resources:

- BPA would require that vehicle operations are restricted to established access roads and that no-off road vehicle use would be permitted during the project.
- BPA Historic Preservation staff would provide a pre-construction briefing to the BPA TLM construction crews regarding avoidance and mitigation measures required for the project.
- BPA would restrict vehicle travel over select spur roads to dry soil conditions.
- A Yakama Nation CRP cultural monitor would be present to observe BPA activities within or adjacent to TCP locations reported within the project area, and that archaeological resources identified within the TCPs would be avoided during project activities.
- A cultural monitor from the CTWSRO would be present during all project activities within the areas identified in the CTWSRO HPRCSIT report, and/or at the discretion of the CTWSRO Tribal Historic Preservation Officer.

2. BPA would coordinate with the Nez Perce Tribe, the Yakama Nation, the CTWSRO, and the Confederated Tribes of the Umatilla Indian Reservation to prepare a project-specific monitoring and post review discovery plan prior to project implementation to ensure that no cultural places or resources are affected by this project. **Geology and Soils**

Potential for Significance: No with Conditions

Explanation: Project activities are expected to cause temporary soil disturbances that increase the chance of project-related erosion. Site restoration would begin during, and immediately after, the pole replacements and would include the minimization measures discussed below. Additional BMPs would be implemented as necessary. Therefore, the proposed action would have limited temporary impacts on geology and soils.

Notes:

- Prepare soils for revegetation by contouring, if necessary, to blend with existing topography, and by surface-roughening by tracking and/or contour furrows as described in BMP C130 in the Western Washington Stormwater Manual.
- Re-establish vegetative cover/stabilization by seeding and mulching as described in BMP C120: Temporary and Permanent Seeding; and C121: Mulching. An appropriate seed mix would be chosen from BMP C120 and applied at the recommended rate, unless otherwise specified by landowner.
- Use bonded fiber matrix (as discussed in BMP C121) for slopes greater than 2.5H:1V (40 percent) or rolled erosion control products (as discussed in BMP C122: Nets and Blankets).

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

Potential for Significance: No

Explanation: There are no Federal or state special-status nonvascular plant species or habitats known to occur in the general project area. There are also no Federal special-status vascular plant species or habitats known to occur in the project area; however, Washington vascular plant species of conservation concern have been observed in the general vicinity of the project area and include: Oregon white-top aster (State Endangered [SE]), Oregon bolandra (State Threatened [ST]), branching montia (State Sensitive [SS]), and northern bog clubmoss (SS). The above listed plant species are also on the list of CRGNSA sensitive wildlife and plants. These species have not been recorded where project activities would be performed, and these areas are not expected to possess the habitat conditions conducive to the establishment of these species. In general, construction activities would result in temporary impacts to vegetation from mowing or crushing at structure sites, pulling/tensioning sites, landing zones or staging areas; however, the project is not expected to impact sensitive plants listed in the Endangered Species Act (ESA), on the list of Washington vascular plant species of conservation concern, or on the list of CRGNSA sensitive vascular species lists.

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

Potential for Significance: No with Conditions

Explanation: State sensitive wildlife species have been observed in the vicinity of the project area and include: western gray squirrel (SE), northwestern pond turtle (SE), Larch Mountain Salamander (SS), The above listed species are also on the list of CRGNSA sensitive wildlife and plants. These species have not been recorded where project activities would be performed, and it is unlikely that project activities would impact these species because project sites generally do not contain the habitat conditions for these species. In general, the project would have a small impact on wildlife, plants, and habitat related to temporary disturbances associated with equipment use and human presence. Typically, these temporary disturbances have a relatively small footprint and would last less than 10 hours a day, during daylight hours, for approximately five consecutive days per site. Wildlife, if present, is anticipated to use adjacent habitat and could return to the project area soon after the completion of work.

A list of federally-listed, proposed, and candidate species potentially occurring within the project boundaries was obtained from the United States Fish and Wildlife Service (USFWS) on April 4, 2025, and updated on September 25, 2025. The list included gray wolf, North American wolverine, northern spotted owl, yellow-billed cuckoo, northwestern pond turtle, bull trout, monarch butterfly, and Suckley's cuckoo bumble bee; and designated critical habitat for northern spotted owl. BPA assessed the proposed project's potential impacts to the species and critical habitat listed above. BPA determined that the proposed project may affect but is not likely to adversely affect northern spotted owl and northwestern pond turtle. BPA also determined that the project would be not likely to jeopardize the continued existence of monarch butterfly or Suckley's cuckoo bumble bee, and would have no effect on gray wolf, North American wolverine, yellow-billed cuckoo or their designated critical habitat. The US Fish and Wildlife Service issued a letter of concurrence and conference concurrence dated January 8, 2026.

Notes: The following conservation measures would be implemented during this project:

- Adhere to the following timing restrictions:
  - No construction activities within 0.25-mile of suitable northern spotted owl habitat would take place between March 1 to July 15.
  - Helicopter use within 110 yards of suitable northern spotted owl habitat would not take place between March 1 and September 30.
  - No project activities would occur earlier than 30 minutes after sunrise or later than 30 minutes before sunset each day during the northwestern pond turtle (NWPT) active season, between April 1-September 30. The one exception would be for brief midnight outages at North Bonneville Substation to connect and disconnect the shoo-fly in approximately August 2027, November 2027, September 2028, and November 2028.
- Helicopter use and flight paths would be limited to areas within and near the Project right-of-way as much as practicable to minimize the extent of noise disturbance.
- Visual encounter surveys of lentic habitat would be conducted within 500 meters of project activities in hydrologic units with confirmed NWPT occurrences. If visual encounter surveys result in positive findings, additional steps defined in the Biological Assessment would be required to minimize impacts.
- A site search would be conducted for NWPTs potentially overwintering in vegetation that would be cleared prior to the construction of the shoo-fly tap at North Bonneville Substation (planned for March 2026).
- To minimize the risk of attracting predators to activity areas, all garbage (especially food products) must be contained or removed daily from the vicinity of any activity that occurs within the action area.
- Sensitive species awareness training would be conducted for construction personnel working on this project. The training would include a description of ESA-listed species, general ecology and their habitat, measures to implement to reduce impacts to ESA-listed species, and avoidance and minimization measures which may include work stoppage procedures if ESA-listed species are observed within work areas

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

Potential for Significance: No with Conditions

Explanation: A list of federally-listed, proposed, and candidate fish species potentially occurring within the project boundaries was obtained from the United States Fish and Wildlife Service (USFWS) on April 4, 2025, and updated on September 25, 2025. The list included bull trout and its critical habitat. Additionally, the project crosses streams in the Lower Columbia River Recovery Domain that provide habitat for ESA-listed salmon and steelhead under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA). Project activities are located in upland areas away from waterbodies, floodplains, listed fish species, or their habitat, thus, BPA determined that the project would have no effect to ESA-listed resident and anadromous fish under the jurisdiction of USFWS and NOAA, and are not expected to impact waterbodies or floodplains.

Notes: The BMPs described above would minimize the potential for the proposed project to impact waterbodies, floodplains, listed fish species, or their habitat.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: In general, wetlands adjacent to project work areas would be avoided. A small amount of permanent wetland disturbance is expected for the replacement of structure 6/1 and would be covered under Nationwide Permit 57. The impacts would not meet the notification threshold for preconstruction notification.

Notes: The following conservation measures would be implemented during this project:

- Project activities in the vicinity of structure 6/1 must be performed in accordance with United States Army Corps of Engineers' general and regional conditions, and Washington Department of Ecology's general water quality conditions.
- Wetlands and saturated soils must be adequately protected from compaction and soil disturbance. Wheel rutting greater than 3 inches is an indicator that soils may be too saturated to support construction equipment and is not permitted in wetlands. Utilize wood or composite wetland mats, or other BPA-approved methods at all structure sites, staging areas, and pulling and tensioning sites that are located within wetlands or saturated soils. Restore any wetland soils disturbed or compacted by construction activities.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Project activities are not expected to impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project area is within the CRGNSA; however, the project is not expected to permanently impact scenic resources, cultural resources, natural resources, and recreation resources. BPA provided a completed information submittal form to the US Forest Service on August 13, 2025, and requested feedback on potential sensitive resource impacts in the CRGNSA. The agreed-upon comment window elapsed without receiving any comments from the US Forest Service, indicating no objections. This decision was confirmed in a coordination meeting between BPA and the CRGNSA on January 7, 2026.

9. Visual Quality

Potential for Significance: No with Conditions

Explanation: Construction activities, including helicopter use, may be temporarily visible from some key viewing areas and may temporarily generate dust if conditions are dry at the time of construction; however, the appearance of the transmission line and the ROW after construction would be consistent with baseline conditions.

Notes: The following conservation measures would be implemented during this project:

- A fugitive dust control plan would be developed and implemented if construction activities are expected to produce dust.

10. Air Quality

Potential for Significance: No with Conditions

Explanation: The proposed project would utilize conventional equipment and helicopters powered by petroleum fuels. Exhaust would temporarily impact air quality in the immediate vicinity while the equipment is in operation. Additionally, dust may be created by helicopter operations and construction activities. Dust creation would be isolated to small areas and in short duration. Water would be used for dust suppression if needed. Baseline air quality conditions are expected to return shortly after project activities cease.

Notes: The following conservation measures would be implemented during this project:

- A fugitive dust control plan would be developed and implemented if construction activities are expected to produce dust.

11. Noise

Potential for Significance: No

Explanation: Project would produce noise associated with the use of construction equipment and a small helicopter. During project activities, work would take place during daylight hours, for approximately eight hours per day. The project would be relatively short in duration – expected to last approximately two weeks. The baseline operational noise of the transmission line would not change.

12. Human Health and Safety

Potential for Significance: No

Explanation: A site-specific health and safety plan would be prepared to address any hazards that may be encountered during the proposed work. The proposed work is necessary to ensure ongoing operation of the Underwood Tap to Bonneville PH No. 1-Alcoa No. 1 & No. 2 transmission line that serves rural Skamania County. Installing fall protection flanges is expected to result in safer working conditions for linemen. Project activities are not expected to result in adverse impacts on human health or safety.

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: The US Forest Service, CRGNSA office was notified on August 13, 2025, as discussed above. Private landowners would be notified by BPA or the construction contractor closer to the date of construction; however, project activities are consistent with activities typically permitted by easement agreements and that do not require notification.

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

Signed: /s/ *Oden Jahn* Date: *March 23, 2026*
Oden Jahn
Physical Scientist (Environmental)