

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: North Bonneville-Troutdale No. 1 and North Bonneville-Ross No. 1 Access Road Maintenance and Impairment Remediation

Project No.: P02477

Project Manager: Andrew Young, TIPL-TPP-1

Location: Clark and Skamania counties, Washington

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine maintenance; B1.13 Pathways, short access roads, and rail lines; B1.24 Property transfers

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to improve and reconstruct existing access roads, construct new access roads, and correct conductor impairments in line miles 1 to 22 on the 230-kilovolt (kV) North Bonneville-Troutdale No. 1 and the 230-kV North Bonneville-Ross No. 1 transmission lines in Skamania and Clark counties, Washington. The proposed access road work is required to ensure vehicles and construction equipment can safely and reliably access structures in the worst weather for maintenance, repair, and operation of both transmission lines, which share a single right-of-way (ROW). The proposed conductor impairment corrections are required to bring the transmission lines into compliance with industry standards; thereby ensuring system safety and reliability.

The following is a summary of the proposed access road work (distances are approximate):

- Access Road Construction: 0.7 mile
- Access Road Reconstruction: 4.1 miles
- Access Road Improvement: 7.5 miles
- Access Road Decommissioning: 400 feet

New access road construction would include clearing and grubbing to remove all vegetation, stumps, and debris from the road corridor; cutting, filling, grading, and compacting to establish the road base; and then laying, shaping, and compacting gravel to form the road surface. Access road reconstruction is required where an existing road prism is present, but in poor condition and potentially impassable. Reconstruction would include clearing vegetation and debris, reestablishing the road base, and reconstructing the road surface, similar to new access road construction. Improvement of existing access roads would occur within the existing access road prisms and would include minor grading of the road base and laying, shaping, and compacting gravel in select locations. Common drainage features (e.g., ditches, cross-drain culverts, water bars, and drain dips) would be repaired, replaced, or installed new. BPA would also repair, reconstruct, or install new landings at the bases of transmission structures, vehicle approaches, pullouts, turn-arounds, and gates. To decommission an access road, light shaping or grading and potentially importing fill material would be required to establish a more natural contour, and then the disturbed area would be seeded.

BPA would install one new ford and one new stream culvert and would replace two existing stream culverts in locations where an access road crosses a perennial or intermittent stream. Because no anadromous or resident fish are present in any of these streams, fish passage design is not required for the ford or stream culverts. The ford would be constructed of interlocking concrete blocks laced with cables to create a flexible matrix. The system would be flexible and would conform to the natural stream contours. The stream culverts would be designed to meet the hydrologic conditions of the watershed (i.e., large enough to pass the 100-year flood event). All ford and stream culvert construction areas would be isolated from flowing water by a gravity diversion, pumping water around the site, or when intermittent streams are dry.

The standard width of the finished road prism is 14 feet, with up to approximately 3 feet of additional disturbance on either side of the road for ditches, side casting, road ditch out-sloping, and/or other related construction activities. Therefore, the total disturbed width for typical BPA access roads would be approximately 20 feet, except where additional width would be necessary for turn radii and cut and fill slopes. In one location, an approximately 120-foot-long, single-high gabion basket wall would be installed to stabilize a landslide and provide adequate road width. BPA would clear and grub vegetation, as needed, within the 20-foot-wide road corridor. An excavator would likely be used to clear and grub shrubs and saplings growing along the road and to break smaller branches growing into the roadway. Chainsaws could be required to remove larger woody vegetation and limbs growing into the roadway.

The conductors are impaired to the ground in four spans of North Bonneville-Troutdale No. 1 and four spans of North Bonneville-Ross No. 1. To increase the distance between the conductor and the ground, BPA would clear vegetation and excavate underneath the transmission lines in seven of those spans. Only the minimum quantity of vegetation and soil necessary to address the impairment would be removed, and soils would be dispersed onsite. The table below summarizes the seven impairments that would be corrected by ground excavation (areas are approximate):

Transmission Line	Span	Area Excavated (square feet)
North Bonneville-Troutdale No. 1	5/3 – 5/4	2,200
North Bonneville-Troutdale No. 1	14/4 – 14/5	4,510
North Bonneville-Troutdale No. 1	16/1 – 16/2	1,710
North Bonneville-Troutdale No. 1	20/3 – 20/4	4,390
North Bonneville-Ross No. 1	19/3 – 19/4	3,130
North Bonneville-Ross No. 1	20/3 – 20/4	3,680
North Bonneville-Ross No. 1	20/4 – 21/1	1,570
	Total	21,190 (0.5 acre)

The single remaining impairment in span 17/1 – 17/2 on North Bonneville-Troutdale No. 1 would be corrected by adding a mid-span prop structure to raise the conductor. The prop structure would consist of two wood poles, approximately 95 feet tall, and would include cross-arms, crossbraces, buried ground wires, insulators, hardware, and other features typical of wood pole structures. The wood poles would be installed using a truck-mounted augur or an excavator, depending on site conditions. Additional equipment required to complete the transmission structure work would include cranes, bucket trucks, and/or line trucks.

BPA has determined that structure 11/3 on North Bonneville-Ross No. 1 has overstressed cross members. The structure would be repaired in-place by replacing the deformed members with new structural steel members.

The proposed action would require the use of heavy equipment, including graders, rollers, bulldozers, excavators, backhoes, dump trucks, cranes, chainsaws (for tree removal), and light-duty trucks. During construction, materials and equipment would be staged within previously disturbed areas at intervals along the access roads. In areas where BPA does not have existing land rights, access road easements would be acquired.

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 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.

Walker Stinnette
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: North Bonneville-Troutdale No. 1 and North Bonneville-Ross No. 1 Access Road Maintenance and Impairment Remediation

Project Site Description

The project site includes BPA's existing transmission line ROW and associated access roads in line miles 1 to 22 on the North Bonneville-Troutdale No. 1 and North Bonneville-Ross No. 1 transmission lines in Clark and Skamania counties, Washington. Work would occur on BPA fee-owned property or within BPA's existing transmission line and access road easements on private property and land managed by the State of Washington for recreation, conservation, and silviculture. The area is within the Western Cascades Lowlands and Valleys ecoregion, which is characterized by forests of Douglas fir and western hemlock and mountainous terrain with steep ridges and narrow valleys. Vegetation within the ROW and along the margins of access roads consists of a mix of common, low-growing shrubs and grasses that are periodically mowed or treated with herbicides as part of routine transmission line maintenance. Designated northern spotted owl (*Strix occidentalis caurina*) critical habitat is present near line miles 1 to 3. The project site is surrounded by undeveloped coniferous forests in various stages of succession due to historic and ongoing timber harvest. These forested areas are interspersed with rural residential properties and some commercial development. Line miles 4 and 5 are within Beacon Rock State Park; no campgrounds or recreational trails are located within 500 feet of any work areas. The eastern portion of the ROW is located within the Columbia River Gorge National Scenic Area (CRGNSA) on lands designated as Urban Areas (General Management Area [GMA]), Forest (Special Management Area [SMA]), Public Recreation (SMA), and Open Space (SMA).

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with conditions

Explanation: On February 27, 2024, BPA initiated National Historic Preservation Act, Section 106 consultation with the following parties:

- Confederated Tribes and Bands of the Yakama Indian Reservation
- Confederated Tribes of Grand Ronde
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Cowlitz Indian Tribe
- Gifford Pinchot National Forest
- US Forest Service CRGNSA
- Washington Department of Archaeology and Historic Preservation (DAHP)
- Washington Department of Natural Resources
- Washington State Parks and Recreation Commission

BPA conducted background research and an intensive field survey of the Area of Potential Effects (APE). The research and survey identified five archaeological resources and five historic properties that were previously documented in the APE as well as two historic period archaeological resources and one historic built resource that were newly documented. No ground disturbing work would occur near any of the five previously

documented archaeological resources. The five historic properties are BPA assets that have been determined eligible for inclusion in the National Register of Historic Places (NRHP) and include North Bonneville Substation, North Bonneville-Troutdale No. 1, North-Bonneville-Ross No.1, North Bonneville-Troutdale No. 2, and Bonneville PH-Alcoa No. 1 & 2. The proposed action would not negatively impact the integrity of these resources. The three newly documented resources were recommended as not eligible for inclusion in the NRHP.

Therefore, as per §36 CFR 800.5(b), BPA determined on November 8, 2024, that the implementation of the proposed project would result in no adverse effect to historic properties (BPA Project No.: WA 2024 019; DAHP Log No.: 2024-02-01407). Concurrence was received from DAHP on November 12, 2024. No other comments were received from the consulting parties.

Notes:

- Delineate a 30-foot avoidance buffer around the two newly documented historic period archaeological resources and the one newly documented historic built resource.
- Implement the Post Review Discovery Procedure in the unlikely event that cultural material is inadvertently encountered during implementation. Discontinue all ground-disturbing activity 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 with conditions

Explanation: The proposed action would permanently impact soils from the construction of approximately 0.7 mile of new access road. Additional ground disturbance would be limited to the margins of the existing 14-foot-wide road prisms within the existing 20-foot-wide road corridor and areas where soil excavation is required to correct impairments (approximately 0.5 acre total). The decommissioned access road would be graded and shaped to match the surrounding terrain and then seeded. Standard construction best management practices (BMPs) would be implemented to minimize soil erosion, sedimentation, and fugitive dust, as appropriate. Temporarily disturbed areas would be seeded to stabilize exposed soils and would eventually return to pre-existing conditions following completion of the proposed action. The proposed action would not impact geology.

Notes:

- Fill material generated from the project site, containing or suspected to contain invasive plants, shall be stockpiled within the project area and as close to the infested source area as possible. The material shall not be broadcast for disposal.

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

Potential for Significance: No with conditions

Explanation: The proposed action would primarily occur within existing gravel access road prisms and landings where little to no vegetation is present. Temporary vegetation impacts would occur where excavation is required to correct impairments as well as within the 20-foot-wide access road corridor where BPA would clear and grub vegetation, as needed. Vegetation would either be cut and scattered onsite, crushed and left in place, or mowed. Permanent vegetation impacts would occur in areas where short segments of new access roads and new landings are required. Standard construction BMPs would be implemented, as necessary, to revegetate temporarily disturbed areas and to prevent the spread of noxious weeds. No special-status plant species or habitats are documented within or near the project site. Therefore, the proposed action would have no effect on special-status plant species or habitats.

Notes:

- Revegetate temporarily disturbed areas with a regionally appropriate seed mix.
- Clean all construction equipment and vehicles prior to entering the project site to prevent the spread of noxious weeds.

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

Potential for Significance: No with conditions

Explanation: The proposed action could result in minor and temporary wildlife disturbance from elevated noise and human presence during construction. Designated northern spotted owl critical habitat is present near the eastern portion of the project site, between structures 1/1 and 3/2. Potentially suitable northern spotted owl nesting habitat is modeled between structures 8/1 and 9/3 and between structures 4/2 and 5/3. However, given the predominance of relatively young forest stands, it is likely that typical nesting habitat for spotted owls is not present and the proposed action does not include the removal of any suitable habitat. Furthermore, the closest documentation of nesting northern spotted owl is over three miles from the project site and was recorded in 1994. It is expected that most wildlife species that could be present would be able to avoid the project sites during construction and would likely reoccupy temporarily disturbed areas following completion of the proposed action. With adherence to the minimization measure below, the proposed action would have no effect on special-status wildlife species or habitats.

Notes:

- Prohibit construction activities between structures 1/1 and 3/2, structures 4/2 and 5/3, and structures 8/1 and 9/3 until during the northern spotted owl critical nesting period (March 1 through July 15). Construction in these areas may proceed after July 15.

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

Potential for Significance: No with conditions

Explanation: The proposed action would require work in perennial and intermittent streams, including installation of one new ford and one new stream culvert and replacement of two existing stream culverts. BPA assessed the potential impacts to Waters of the U.S. and Waters of the State for compliance under Sections 404 and 401 of the Clean Water Act. BPA determined that one stream culvert would be replaced in-kind and is therefore exempt from permit requirements per Section 404(f)(1). For the remaining three streams, BPA delineated the ordinary high water mark and is in the process of obtaining a Section 404 Clean Water Act Permit and a Section 401 Water Quality Certification.

The proposed action would temporarily impact water quality from excavation in and near unnamed small waterways and a pond. However, with the implementation of BMPs, 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 minimized.

No in-water work would occur in fish-bearing streams. Therefore, the proposed action would have no effect on special-status fish species or habitats.

Notes:

- Obtain a Section 404 Clean Water Act Permit and a Section 401 Water Quality Certification.
- Implement the permit terms of the Section 404 Clean Water Act Permit and the Section 401 Water Quality Certification during construction activities.

6. Wetlands

Potential for Significance: No with conditions

Explanation: The proposed action would impact a single wetland (less than 0.10 acre) from access road improvement and installation of a new stream culvert. BPA assessed the potential impacts to Waters of the U.S. and Waters of the State for compliance under Sections 404

and 401 of the Clean Water Act. BPA delineated the boundary of the wetland and is in the process of obtaining a Section 404 Clean Water Act Permit and a Section 401 Water Quality Certification. Standard construction BMPs adherence to the minimization measure below would prevent indirect impacts to wetlands present outside of work areas.

Notes:

- Obtain a Section 404 Clean Water Act Permit and a Section 401 Water Quality Certification.
- Implement the permit terms of the Section 404 Clean Water Act Permit and the Section 401 Water Quality Certification during construction activities.
- Ensure that soils excavated to correct the impairments in span 20/3 to 20/4 are not deposited in the nearby wetlands.
- Deposit excavated sediments in upland locations that are not hydrologically connected to any stream or wetland. Stabilize excavated sediment with temporary erosion and sediment controls and/or reseeded to prevent migration off-site.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: The proposed action would not result in ground disturbance that could reach depths to ground water or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The proposed action would include access road construction, reconstruction, and improvement as well as conductor impairment remediation within the CRGNSA. Work would primarily occur within existing gravel access road prisms and landings, with limited ground disturbance in previously undisturbed areas to construct short segments of new access road and to correct a single impairment. The proposed action would not result in a change in land use. BPA determined that the project meets the criteria for the National Scenic Area Act "Savings Provision," which allows BPA to operate, maintain and modify existing transmission facilities within the CRGNSA. BPA contacted the U.S. Forest Service CRGNSA office on February 28, 2025 and again on March 20, 2025, to confirm BPA's determination that the savings provision applies and consistency review is not needed. No response was received.

No work is proposed within 500 feet of a Beacon Rock State Park hiking trail or campground. Therefore, the proposed action would not impact recreational land use.

Notes:

- Deploy flaggers and/or signage around construction sites within line miles 3-5 near locations where recreational trails cross the work area to reduce conflicts with recreational users.
- Coordinate with Washington State Parks and Recreation Commission to post alerts on the Beacon Rock State Park website and/or at trailheads and campsites, if required.

9. Visual Quality

Potential for Significance: No

Explanation: During construction, the presence of construction equipment and general construction activities would cause temporary visual impacts. Clearing vegetation and constructing new access roads would cause permanent visual impacts. However, much of the project site is in remote and undeveloped locations, and few individuals would likely notice these changes. The final appearance of the project site would be consistent with the existing visual quality of the transmission line right-of-way and access road network.

10. Air Quality

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and vehicle emissions. There would be no long-term change in air quality following completion of the proposed action.

11. Noise

Potential for Significance: No

Explanation: The proposed action would result in minor and temporary noise that would intermittently exceed current ambient conditions. Project-related noise could be audible from properties located near the transmission line ROW, including recreational areas in Beacon Rock State Park. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7 AM to 7 PM) on weekdays during typical working hours. Furthermore, work locations are more than 500 feet from any recreational areas, and construction-related noise would attenuate substantially over that distance. Work would progress quickly along the transmission line with noise impacting a given area for no more than a few days. There would be no long-term change in ambient noise following completion of the proposed action.

12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed throughout implementation of the proposed action to minimize risk to human health and safety. Therefore, the proposed action would not be expected to impact human health and 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 proposed action would occur on BPA property or in areas where BPA has acquired, or would acquire, all necessary rights from the underlying landowners. BPA has notified public land managers, including the U.S. Forest Service CRGNSA office and Washington State Parks and Recreation Commission, and would continue to involve and coordinate with underlying landowners, as necessary.

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

Signed:

Walker Stinnette
Environmental Protection Specialist