

## Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY22-FY24 Kalispell Priority Pole Replacements (*Update to Previous CX issued March 16, 2026*)

**Project No.:** P05056

**Project Manager:** Christine Sullivan – TELP-TPP-1

**Location:** Flathead, Lincoln, and Sanders counties, Montana

**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 perform in-kind replacement of thirty-six wood pole structures and associated structural/electrical components (e.g., cross arms, insulators, guy anchors, etc.) along the Columbia Falls – Kalispell No.1, Columbia Falls – Trego No. 1, Libby – Bonners Ferry No. 1, Kalispell - Kerr No. 1, and Hot Springs - Rattlesnake No.1 transmission lines. Replacement poles would be placed in or adjacent to existing holes following removal of current pole structures and may be re-augured to assure proper depth placement. The proposed project would improve and repair approximately 4.7 miles of access roads, along with installation of water bars, drain dips, and minor maintenance along existing access road prisms. Access road maintenance may include blading, shaping, grading, brushing, and placing surface rock on the existing road prisms. Sixteen new landings, three gates, one approach, one turnaround, one 1,200 square ft. pullout, and one new 1,000-linear-foot access road would also be constructed. General equipment used for this type of work includes graders, rollers, bulldozers, brush hogs, excavators, and dump trucks. No unauthorized construction activities would occur in any water body including streams, ponds, or wetlands.

Wood pole replacement locations are listed below:

Transmission Line	Structure	TRS	County, State
Columbia Falls-Kalispell No. 1	4/1	T30N R20W SEC34	Flathead, MT
Columbia Falls-Kalispell No. 1	5/5	T29 R20W SEC4	Flathead, MT
Columbia Falls-Kalispell No. 1	6/4	T29N R20W SEC9	Flathead, MT
Columbia Falls-Kalispell No. 1	7/1, 7/3, 7/5, 7/6	T29N R20W SEC17	Flathead, MT

Columbia Falls-Kalispell No. 1	8/2, 8/3, 8/4, 8/5, 8/7, 8/8, 8/9	T29N R20W SEC20	Flathead, MT
Columbia Falls-Kalispell No. 1	9/1,	T29 R20W SEC29	Flathead, MT
Columbia Falls-Kalispell No. 1	9/7, 9/8	T29N R20W SEC30	Flathead, MT
Columbia Falls-Kalispell No. 1	10/1, 10/5, 11/2	T29N R20W SEC31	Flathead, MT
Columbia Falls-Kalispell No. 1	11/3	T28N R21W SEC1	Flathead, MT
Libby-Bonnors Ferry No. 1	7/6,	T31N R30W SEC21	Lincoln, MT
Libby-Bonnors Ferry No. 1	10/6, 10/9, 10/10, 11/1	T31N R31W SEC25	Lincoln, MT
Libby-Bonnors Ferry No. 1	11/5	T31N R31W REC26	Lincoln, MT
Kalispell-Kerr No. 1	10/3	T27N R21W SEC22	Flathead, MT
Hot Springs-Rattlesnake No. 1	16/6	T19N R22W SEC4	Sanders, MT

The proposed action would maintain reliable power in the region. All work would be done in accordance with the National Electrical Safety Code and BPA Standards.

**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.

/s/ Adrienne Wojtasz

Adrienne Wojtasz  
Physical Scientist (Environmental)

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

Date: April 1, 2026

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:** FY22-FY24 Kalispell Priority Pole Replacements (Update to Previous CX issued March 16, 2026)

## **Project Site Description**

Proposed routine maintenance activities would be conducted along the Columbia Falls – Kalispell No.1, Columbia Falls – Trego No. 1, Libby – Bonners Ferry No. 1, Kalispell – Kerr No. 1, and Hot Springs – Rattlesnake No. 1 transmission lines. Proposed maintenance activities would be performed in the existing transmission line rights-of-way and access road easements which are located in privately-owned, state- and federally-managed, agricultural, and forested areas. Federal land management agencies include the US Forest Service (USFS) Kootenai National Forest.

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

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

Potential for Significance: No

Explanation: BPA initiated consultation with the Blackfeet Nation, the Confederated Salish and Kootenai Tribes, the Kootenai Tribe of Idaho, Montana State Lands, and the Montana State Historic Preservation Office (SHPO) on January 22, 2025. Portions of the project are located on USFS Kootenai National Forest-owned lands. BPA was the lead Federal agency for Section 106 and the USFS concurred with BPA's APE. Montana State Lands concurred with the APE on January 23, 2025.

BPA's contractor Dudek conducted a cultural resources pedestrian survey and subsurface testing and identified one isolate (not eligible), four built resources (not eligible), and the Great Northern Railroad (eligible). All the proposed transmission lines are eligible; however, the undertaking would not adversely impact their eligibility. BPA sent its **no adverse effect to historic properties** determination to the consulting parties on August 25, 2025. The USFS concurred with BPA's determination. Montana State Lands concurred on September 29, 2025, and Montana SHPO concurred on September 30, 2025.

BPA initiated consultation with the Confederated Salish and Kootenai Tribes, the Kootenai Tribe of Idaho, and the Montana State Historic Preservation Office (SHPO) on April 19<sup>th</sup>, 2024. No responses were received. Four historic built resources are located within the APE; the Libby-Bonners Ferry No. 1 Transmission Line, the Columbia Falls-Trego No. 1 Transmission Line, the Kalispell-Kerr No. 1 Transmission Line, and a historic Forest Service Road. Kalispell – Kerr structure 10/3 has been the only resource identified in this APE. As a result of the cultural resources pedestrian survey and subsurface testing, no archaeological resources were identified.

Three eligible (Criterion A), historic built environment resources were identified; the Libby-Bonners Ferry No. 1 Transmission Line, the Columbia Falls-Trego No. 1 Transmission Line, and the Kalispell-Kerr No. 1 Transmission Line. Although work is occurring on these three historic resources, the wood pole structures that make up the lines naturally degrade and are intended to be replaced over time as part of normal maintenance. The historic

forest service road intersects a DOT road where no work is proposed and is not eligible for listing on to the NRHP. Therefore, no further management is necessary.

Therefore, as per §36 CFR 800.5(b), BPA has determined that the implementation of the proposed undertaking will result in **no adverse effect to historic properties**.

BPA initiated consultation with the Confederated Salish and Kootenai Tribes (CSKT) Tribal Historic Preservation Office (THPO) and the CSKT on August 28<sup>th</sup>, 2025. The APE was surveyed by AECOM and no archaeological resources were identified. The Hot Springs-Rattlesnake is an eligible historic built resource, however, BPA determined that the project would not impact the integrity of the line. Therefore, on August 28<sup>th</sup>, 2025, BPA determined that the implementation of the proposed undertaking will result in **no adverse effect to historic properties**.

## 2. Geology and Soils

Potential for Significance: No

Explanation: Localized soil disturbance would occur during wood pole replacement and access road improvements. 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 during structure replacement, relocation, and access road improvements as the locations have been previously disturbed with minimal vegetation. There would be no effect to ESA-listed plant species. No impacts to state or federally sensitive species is anticipated. Projects activities would be limited to already impacted access roads and transmission line rights-of-way and would not substantially alter existing plant species.

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

Potential for Significance: No with Conditions

Explanation: Local wildlife, such as small to midsized mammals and birds, could be disturbed by project activities, assuming they are present in the project area. However, disturbance would be temporary, and the surrounding landscape provides ample habitat and cover for displaced animals. BPA reviewed available data sources, and no special-status state or USFS sensitive species would be impacted by the project activities.

For the Libby-Bonnors Ferry No. 1 transmission line, BPA engaged in informal consultation with the USFWS on December 19, 2024, pursuant to its responsibilities under Section 7 of the ESA. BPA determined, and received concurrence on February 13, 2025, from USFWS, that the proposed project actions "*may affect, [but is] not likely to affect*" North American wolverine, grizzly bear, Canada lynx, and Canada lynx designated critical habitat. The proposed actions will have "*No Effect*" to yellow-billed cuckoo. The proposed action is "*not likely to jeopardize the continued existence*" of the proposed species monarch butterfly. The projects areas are not within grizzly bear recovery zones, grizzly bear management units, or areas  $\geq 1,600$  meters in elevation.

The remaining project area does not include habitat for any federally-listed sensitive species. Consequently, there would be no effect on ESA-listed species within these areas. Project activities, limited to already impacted rights-of-way, would not substantially alter the footprint or operational noise of the line. While wildlife and associated habitats may experience temporary disturbance during construction, no long-term impacts are anticipated.

Notes:

- BPA personnel and contractors would be required to properly store and dispose of materials that could attract grizzly bears to the Action Area per USFWS requirements.
- Overnight camping would not take place during the course of activities.
- BPA would report any sightings of ESA-listed species to USFWS within 24 hours, or as quickly as practicable, and include date, time, location, photos, direction of travel, presence of a radio collar, and any other descriptive information that might be useful in identifying the bear.
- BPA personnel and contractors performing activities in the right-of-way and access roads away from their vehicles will be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.
- Construction activities would take place during daylight hours to minimize noise and disturbance during times when local species are more active; no night construction is permitted.

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

Potential for Significance: No with Conditions

Explanation: There are no water bodies, floodplains, or fish streams located in the project area. In December 19, 2024, consultation on the Libby-Bonnors Ferry No. 1 transmission line bull trout and white sturgeon was completed as part of the APE. Pursuant to obligations under Section 7, BPA determined, that the proposed project actions would have “*No Effect*” to white sturgeon, bull trout, and bull trout designated critical habitat.

Notes:

- Locate refueling and servicing operations where spilled material cannot enter natural or manmade waterbodies and drainage conveyances (e.g., ditches, catch basins, ponds, wetlands, streams, and pipes). Use pumps, funnels, absorbent pads, and drip pans when fueling or servicing vehicles and equipment. Vehicle maintenance other than emergency repair may not be performed on site.
- The construction project would operate under a project specific erosion and sediment control plan (BPA ESCP plan or NPDES permit) to mitigate potential erosion and sedimentation into waterways and stabilize disturbed soils.
- During all sediment-generating activities, site-appropriate sediment transport minimization measures such as sediment curtains, fiber wattles, hay bales, sediment fences, or mulch would be fully functional prior to commencing work and maintained during sediment-generating activities to minimize unintentional erosion/sediment introduction into aquatic resources. Non-biodegradable materials, such as chicken wire, hog fencing, or plastic netting would not be used for soil stabilization.

## **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are present in the project area.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No use of groundwater proposed and excavation would not extend to a depth that would intersect groundwater.

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

Potential for Significance: No

Explanation: No specially-designated areas were identified within the project area. Land use would not change as a result of project activities.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The replacement of wood poles on the Columbia Falls – Kalispell No.1, Columbia Falls – Trego No. 1, and Libby – Bonners Ferry No. 1 and access road work may change the existing visual character of the area; however, the area is currently a high voltage transmission corridor, and would remain so after project completion, so the overall appearance would not substantially change.

## **10. Air Quality**

Potential for Significance: No

Explanation: Some minor, local impacts to air quality would occur due to the construction activity and vehicular traffic; however, impacts would be temporary and insignificant. Work areas are generally located in remote places.

## **11. Noise**

Potential for Significance: No

Explanation: Construction activity would generate noise. However, impacts would be local and relatively minor. All project activity would occur during daylight hours, and work areas are generally located in remote places.

## **12. Human Health and Safety**

Potential for Significance: No with Condition

Explanation: The project area within mile 7 of the Libby-Bonners Ferry No. 1 transmission line is located in operable unit 3 (OU3) of the Libby Asbestos Superfund Site, which is the former Zonolite vermiculite mine and operated by W.R. Grace & Company. This area has been deemed not to be an immediate threat to human health and safety. The proposed work in these areas would be coordinated with the EPA and W.R. Grace & Company. BPA would follow all applicable health and safety measures defined to ensure human health and safety. The agreement ensures that activities are reviewed by the EPA Remedial Site

Manager, who can determine if the activities are protective of the site. The permit does not fall under an official CERCLA permit but is part of the ongoing processes at the site.

Notes:

- Crews to be trained in working in the Libby Asbestos area by the Lincoln County Asbestos Resource Program and would be implementing institutional controls to ensure work is completed safely.
- Prior to the start of the project, work crews would identify and discuss the job hazards and safety concerns and follow all BPA and OSHA safety procedures during construction.
- EPA requires employers to implement site-specific health and safety plans to address site conditions and hazards.

### **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: Project areas within line mile 6 and 7 out of Libby Substation are within the Libby Asbestos Superfund Site OU3. BPA is engaging in quality assurance measures with the land managers and would implement construction methods that will not disturb hazardous contaminants. The agreement ensures that activities are reviewed by the EPA Remedial Site Manager and can determine if the activities are protective of the site and does not fall under an official CERCLA permit but is part of the ongoing processes at the site. Health and Safety plans would be updated accordingly and would have no uncontrolled or unpermitted releases.

**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: BPA Realty has coordinated with the underlying land managers and private landowners for this work.

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

/s/ Adrienne Wojtasz

Adrienne Wojtasz

Physical Scientist (Environmental)

Date: April 1, 2026