

# memorandum

DATE: August 22, 2014

REPLY TO  
ATTN OF: KEPR-4

SUBJECT: Environmental Clearance Memorandum

TO: Mark Kjelland  
Supervisory General Engineer, TELM-TPP-3

**Proposed Action:** Multiple conductor impairment sites structure raises or modifications

**PP&A Project No.:** 2,805

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.3 Routine maintenance

**Locations:** Multiple existing structures on transmission lines in Pacific and Spokane counties, Washington, and Coos, Curry, Lane, Linn, Polk, and Tillamook counties, Oregon

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposed Action:** BPA proposes to address transmission line clearance impairments at multiple locations in western Washington and western Oregon. The proposed action involves work at eighteen sites (shown in Table 1) to raise wood-pole structures in-kind with taller wood-poles to provide adequate clearance. At a few structures, clearance impairments can be alleviated by raising the structure crossarm and conductors on the existing wood poles, requiring no action on the ground. This is a routine maintenance activity on wood-pole overhead transmission lines.

The transmission line conductor is considered impaired when the clearance between the conductor and other objects (including the ground, roadways, vegetation, orchards, structures, debris, other line conductors, etc.) does not meet the requirements of the National Electric Safety Code (NESC). Impairment locations pose a risk to public health and safety, and failure to correct them in a timely manner can lead to injuries or loss of life by the general public, and damage to properties, livestock, and equipment. These impairments were identified through a process mandated by a North American Electric Reliability Corporation (NERC) alert to ensure reliable and safe operation of Bulk Electric System.

At most sites, actions include replacing the two or three wood-poles of existing line structures in the same location and footprint with taller wood-poles, and reinstalling the crossarm/insulators higher to raise the conductor. On average, wood pole H-frame structures with 60- to 90-foot tall wood poles will be increased about 10-15 feet to raise the conductor in the adjacent transmission line span and remediate the conductor impairment. At the remaining NERC line impairment sites, the crossarms/insulators will be raised on the existing poles, or the conductor will be resagged to meet NESC standards.

There is adequate existing access to all of the structure sites covered by this review, and all are located within existing open, cleared transmission line right-of-way (ROW) corridors on flat to moderate slopes. No landing improvements, excavation outside the base of the poles, or access road construction is proposed as a part of this action. For linemen to safely access the transmission structures and replace wood poles, BPA may perform minimal routine road maintenance, such as adding rock on an existing gravel road. Typical construction equipment at each site will include a couple of transmission line maintenance trucks and a rubber-tracked backhoe or auger. Temporary disturbances at each structure site and landing are expected to be similar to the typical, routine operation and maintenance actions and vegetation management that occurs along BPA high-voltage transmission line corridors.

*Table 1. Multiple impairment sites and actions (alphabetical, by line name)*

BPA Transmission Line & Span	Proposed Action	County, State	BPA District
Bell-Boundary #1 - Span 1/3 Grand Coulee-Bell #5 - Span 85/3	Raise structure 85/3 on the Grand Coulee-Bell #5 line	Spokane County, WA	Bell
Bell- Boundary #3 - Span 3/9	Raise structure	Spokane County, WA	Bell
Boyer-Tillamook #1 - Span 20/6	Raise 21/1 18' to 90'	Tillamook County, OR	Chemawa
Boyer-Tillamook #1 - Span 21/1	Raise 21/2 4.5', 85-95' pole	Tillamook County, OR	Chemawa
Chehalis-Raymond - Span 34/6	Raise 34/6 -18' 90' poles	Pacific County, WA	Chehalis
Chehalis-Raymond - Span 39/5	Raise 39/6 18', 90-80' pole	Pacific County, WA	Chehalis
Hills Creek-Lookout Point 23/9	Raise 24/1 18' 70' poles	Lane County, OR	Alvey
Holcomb-Naselle - Span 1/3	Raise 1/3 9' 60'-60' poles	Pacific County, WA	Chehalis
Holcomb-Naselle - Span 3/7	Raise 3/7 13.5' 80-85 poles	Pacific County, WA	Chehalis
Holcomb-Naselle - Span 8/3	Raise 8/4 31.5" 90-95' poles add x-brace	Pacific County, WA	Chehalis
Langlois Tap - Span 1/2	Resag conductor. Line work only.	Curry County, OR	North Bend
Naselle-Tartlett #1 - Span 1/1	BPA Naselle Substation yard. Raise or modify existing only	Pacific County, WA	Chehalis
Naselle-Tartlett #2 - Span 1/1	BPA Naselle Substation yard. Raise or modify existing only	Pacific County, WA	Chehalis
Reedsport-Fairview #1 - Span 21/5	Raise 21/2 - 9', 60-60' pole	Coos County, OR	North Bend
Salem-Albany #1 - Span 3/8	Raise 3/9 9', 65-65' poles	Polk County, OR	Chemawa
Salem-Grand Ronde #1 - Span 25/1	Raise 25/1 9' 60-60' poles. adjustments only	Polk County, OR	Chemawa
Salem-Grand Ronde #1 - Span 26/5	Raise 26/5 18', 75-75' poles	Polk County, OR	Chemawa
Santiam-Albany #1 - Span 27/4 Albany-Lebanon #1 - Span 2/14	Structure modification only. Move crossarm on Albany-Lebanon #1 2/14 down 5'	Linn County, OR	Chemawa

The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line to minimize risk of outages and maintain power delivery in the region. Due to the urgent nature of the activity, BPA is proposing to perform the work before the end of 2014, unless weather or outages delay work until 2015. All work will be in accordance with NESC and BPA standards.

**Findings:** BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, has not been segmented to meet the definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

The proposed project will not affect any listed threatened or endangered species or designated critical habitat under the Endangered Species Act, or historic properties under the National Historic Preservation Act. The project will not impact areas of great visual value and no project sites are within a governmentally designated scenic area.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Makary A. Hutson

Makary A. Hutson  
Environmental Project Manager

Concur: /s/ Katherine S. Pierce

Katherine S. Pierce  
NEPA Compliance Officer

DATE: August 22, 2014

## Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Multiple Line Impairment Sites - 2014

Work Order #: TBD

**This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.**

<u>Environmental Resources</u>	<u>No Potential for Significance</u>	<u>No Potential, with Conditions (describe)</u>
1. Historic Properties and Cultural Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>
All proposed work will be limited to transmission structure footprints in existing, cleared transmission line ROWs. Structures will be accessed via existing access roads, and no new landings are necessary. Wood poles will be installed reusing the same holes, after the existing poles are removed, or directly adjacent to wood poles in previously disturbed footprint. New wood poles will be in-kind, consistent with existing structures and the rest of the line. If minor road maintenance is required, rock will be placed on top of existing road bed with no new access roads or excavation proposed. An inadvertent discovery protocol will be provided to construction staff.		
2. T & E Species, or their habitat(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BPA completed a review of each site covered by this CX, confirming and documenting that none of the proposed actions at any site would impact ESA listed species or their habitats. No critical habitat, trees or dispersal habitat will be impacted during the remediation of these line impairments in existing, cleared line ROW.		
3. Floodplains or wetlands	<input type="checkbox"/>	<input checked="" type="checkbox"/>
All structures will be accessed via existing access routes and BPA access roads. No sites were identified during a background review of BPA's GIS database or site visits where proposed actions will impact floodplains, waterways, or wetlands. While not anticipated, if any site or access route is too wet for rubber-tired vehicles to access at time of construction, environmental mats shall be installed prior to work to ensure the extent and duration of the impacts are temporary, while allowing the BPA crew to safely perform the work. Erosion and sediment controls must be implemented, if needed, to prevent any construction-related sediment run-off.		
4. Areas of special designation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Health & safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Prime or unique farmlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Special sources of water	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Other – Visual Impacts - Existing facilities, in-kind	<input checked="" type="checkbox"/>	<input type="checkbox"/>

List supporting documentation attached (if needed):

Signed: /s/ Makary A. Hutson

Date: August 14, 2014

Makary A. Hutson, KEPR-4