

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Port Angeles-Sappho Priority Pole Replacements

**Project No.:** 5007

**Project Manager:** Rusty Ludt, TEPL-TPP-1

**Location:** Clallam County, Washington

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

**Description of the Proposed Action:** Bonneville Power Administration (BPA) is proposing to replace deteriorating wood pole structures and any associated hardware and guy wires at specific locations in BPA's Olympia District. The seven structures proposed for replacement include Port Angeles-Sappho #1 26/9, 27/1, 33/8, 33/9, 37/2, 37/9, and 38/5. For all structures, the work would include removing the existing wood pole structures (and guy wires if present) and replacing them with in-kind in the same location. Work areas would be approximately 100 feet by 100 feet at each of the structure replacement locations. Existing access roads would be used to access the work areas and no improvements would be needed.

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

**Findings:** In accordance with Section 1021.410(b) 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), BPA has determined that the proposed action:

- 1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- 2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- 3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

*/s/ Jonnel Deacon*

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

*/s/ Katey C. Grange*

Katey C. Grange

NEPA Compliance Officer      Date: July 9, 2024

Attachment(s): Environmental Checklist

# Categorical Exclusion Environmental Checklist

This checklist 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:** Port Angeles-Sappho Priority Pole Replacements

## **Project Site Description**

Structures being replaced are in forest land. No waterbodies or wetlands would be impacted in project work areas. Land ownership consists of state lands managed by Washington Department of Natural Resources land as well as federal lands managed by the United States Forest Service.

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

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

Potential for Significance: No with conditions

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Washington Department of Archaeology and Historic Preservation (DAHP), the Lower Elwha Klallam Tribe, the Makah Nation, and the Quileute Tribe on April 22, 2024. DAHP concurred with the APE and the determination of no adverse effect on June 4, 2024. No other responses were received within 30 days.

In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted 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

Explanation: Localized soil disturbance would occur during wood pole replacement. Standard construction erosion control measures would be utilized as necessary to reduce the potential for soils to leave work spaces.

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

Potential for Significance: No

Explanation: Minimal disturbance to vegetation is anticipated. There would be no effect to ESA-listed plant species. No impacts to state or federally sensitive species are anticipated. Project activities would be limited to the already impacted access road and transmission line right-of-way and would not substantially alter existing plant communities.

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

Potential for Significance: No with conditions

Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise and human presence. The project would have no impacts to state or federally listed sensitive species, except for marbled murrelet and Northern spotted owl. The United States Fish and Wildlife (FWS) agreed with this not likely to adversely affect determination in a letter dated April 19, 2024 (consultation code FWS/R1/2024-0051740). Impact avoidance and minimization measures include

Notes:

- Daily timing restrictions (two hours after sunrise and two hours before sunset) will be used at dawn and dusk hours during the murrelet breeding season (April 1 to September 23) if a structure replacement is in or near murrelet habitat. This would apply to all construction-related activities including human presence, vehicle traffic, and road work. Pre-work meetings occurring within two hours of sunrise must occur off-site at a developed location.
- BPA would work with FWS to try to schedule certain structures as late in the breeding season as possible and conduct lower impact replacements earlier in the breeding season.
- Absolutely no food scraps of any kind or project-related trash of any kind can be left exposed and unattended for any amount of time. No food may be fed to or left for wildlife. All food and project-related trash must be transported off-site after each workday. The BPA environmental lead would inspect the work area and provide trash management recommendations anytime they are on-site and find trash or food being improperly managed.

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

Potential for Significance: No

Explanation: The project area is not located within a floodplain and there are no nearby water bodies that support resident, anadromous, or ESA-listed fish. Erosion control best management practices combined with the vegetated distance to the nearest waterbody (approximately 75 feet) would ensure that sedimentation would not enter into any water body.

#### **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are documented within the project area. No impacts to wetlands are anticipated.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No use of groundwater proposed. Maximum depth of disturbance would be about 12 feet below ground surface, which would not intersect groundwater.

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

Potential for Significance: No

Explanation: No change in land use would occur. No specially-designated areas are present in the work areas.

## **9. Visual Quality**

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of the wood pole and associated components would be in kind and replaced in the same location; therefore, there would not be a change to the visual quality of the area.

## **10. Air Quality**

Potential for Significance: No

Explanation: The project would have a temporary impact on air quality from a small amount of vehicle emissions and dust generated during construction.

## **11. Noise**

Potential for Significance: No

Explanation: There would be temporary construction noise. Operational noise of the transmission line would not change.

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

Potential for Significance: No

Explanation: The proposed action would allow safe and timely access to the transmission line which would help reduce outage times and maintain reliable power in the region.

### **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: All activities have been coordinated with land managers.

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

Signed: /s/ Jonnel Deacon  
Jonnel Deacon  
EPR-Olympia

Date: July 9, 2024