

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** 2024-Identified Expedited Priority Pole in Bell and Kalispell Districts Restricted Method Replacements

**Project No.:** 5118

**Project Manager:** Amanda Williams, TEPL-TPP-1

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

**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 multiple deteriorating wood pole structures and associated hardware at specific locations in BPA's Bell and Kalispell districts. The structures proposed for replacement are listed below in Table 1. For all structures, the work would include removing the existing wood pole structures and replacing them in kind in the same location. Trucks and equipment would be staged in work areas about 50 feet by 50 feet at each of the structure replacement locations. Existing access roads would be used to access the work areas and no additional ground disturbance beyond the existing pole holes is proposed. Digging to level vehicles and equipment would not occur. Only rubber-tired vehicles would be used; no tracked vehicles would be allowed. A hole may be augered after the original pole is removed to allow placement of the new pole. The auger would be roughly the same size as the original pole diameter. No helicopter use would be required. Fire wraps would also be added where appropriate.

Table 1. List of proposed structures to be replaced.

Maintenance Headquarters	Line Name	Mile	Structure
Bell	Libby-Bonnors Ferry No 1	46	6
Kalispell	Columbia Falls-Trego No 1	31	2
Kalispell	Columbia Falls-Trego No 1	32	4
Kalispell	Columbia Falls-Trego No 1	33	6
Kalispell	Columbia Falls-Trego No 1	33	7
Kalispell	Libby-Bonnors Ferry No 1	12	2
Kalispell	Libby-Bonnors Ferry No 1	12	3
Kalispell	Libby-Bonnors Ferry No 1	12	4
Kalispell	Libby-Bonnors Ferry No 1	12	7
Kalispell	Libby-Bonnors Ferry No 1	12	9

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. 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 1021.410(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; 89 FR 34074, April 30, 2024), 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.<sup>1</sup>

/s/ Jonnel Deacon  
Jonnel Deacon  
Physical Scientist (Environmental)

Concur:

/s/ Katey Grange  
Katey C. Grange  
NEPA Compliance Officer                      Date: March 11, 2025

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, BPA has nonetheless elected to follow those regulations at 40 Code Federal Regulations (C.F.R.) §§ 1500– 1508, in addition to the US Department of Energy's NEPA implementing procedures at 10 C.F.R. Part § 1021, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

# 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:** 2024-Identified Expedited Priority Pole in Bell and Kalispell Districts Restricted Method Replacements

## **Project Site Description**

The project area is an existing right-of-way located in a mix of state-owned and private lands that are managed for timber in northwest Montana. There are no nearby waterbodies or wetlands that could be impacted by the proposed work.

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

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

Potential for Significance: No

Explanation: BPA has determined, per 36 CFR 800.3(a)(1), that this undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: Localized soil disturbance within the previously-excavated hole would occur during wood pole replacement. 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. If vegetation would be impacted, it would be crushed in place. 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. Grizzly bear, Canada lynx, and North American wolverine are present in the project area. BPA consulted with US Fish and Wildlife and determined the project may affect, but is not likely to adversely affect grizzly bear, Canada lynx, and North American wolverine. This is documented in a letter of concurrence (FWS/R6/2024-0149968) dated February 13, 2025.

Notes: The Best Management Practices detailed below are specifically for parts of the project area where threatened, endangered, proposed, and candidate species and habitats occur.

- To avoid disturbance to grizzly bears during the fall and denning season, proposed activities would be conducted between March 16 and October 15 in grizzly bear recovery zones, grizzly bear management units, and areas  $\geq 1600$  meters in elevation.
- BPA personnel and contractors would be required to properly store and dispose of materials that could attract grizzly bears to the work area per USFS requirements.
- Overnight camping would not take place.
- 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 ROW and access roads away from their vehicles would be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.

## **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 would not impact water bodies that support resident, anadromous, or ESA-listed fish. Erosion control best management practices combined with the distance to the nearest waterbody 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.

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

Potential for Significance: No

Explanation: No change in land use. No specially-designated 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 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: BPA would coordinate 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.

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

Date: March 11, 2025