

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Communication System Upgrade Port Angeles and Sappho Substations

**Project No.:** P05153

**Project Manager:** Allen Bell, TEPF-CSB-2

**Location:** Clallam County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.7 Fiber optic cable

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to provide funding to Lumen to upgrade the communication system at BPA's Sappho and Port Angeles Substations, located on private and BPA fee-owned land in Clallam County, Washington. This upgrade would link the Sappho substation to the existing BPA communication system, enabling BPA to remotely view alarm data and access line relays. At both locations, existing access roads would be used and no road improvements would be needed. Approximately 0.45 acres would be temporarily disturbed from this work.

At the Sappho Substation, Lumen would trench about 2,350 feet of conduit for fiber cable within the right-of-way (ROW) of Highway 101. The trench would be excavated to a depth of 3 feet and would not exceed 5 feet in width. The trench would run from an existing vault 200 feet east of Burnt Mountain Road to a new vault that Lumen would install at the intersection of the substation access road and Highway 101. At this same intersection, Lumen would trench approximately 8 feet of conduit to connect the new vault to an existing vault. This existing vault connects to 1,000 feet of existing conduit that parallels the substation access road and connects to the substation control house. Lumen would then pull fiber cable through the new and existing conduit to the control house.

At the Port Angeles Substation, Lumen would pull new fiber through existing conduit and existing vaults outside of the substation yard. Within the substation yard, BPA would trench approximately 75 feet of new conduit between an existing vault and the control house. The trench would be excavated to a depth of 3 feet and would not exceed 5 feet in width. Within the control house, Lumen would pull cable through existing conduit and install communications equipment on existing racks. No other changes would be made to the interior of the control house.

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), 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>

Jillian Cosgrove  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX/SA/EA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its 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:** Communication System Upgrade Port Angeles and Sappho Substations

## **Project Site Description**

The proposed project is located on BPA fee-owned property on and adjacent to BPA's Sappho and Port Angeles substations, as well as state-owned land within the Highway 101 right-of-way. Sappho Substation (Township 30 North, Range 12 West, Section 29) is adjacent to privately-owned forest and Washington Department of Natural Resources-managed state land. Sol Duc River and State Park is on the south side of Highway 101. The BPA environmental lead conducted a site visit on 1/25/25. Where trenching would occur, vegetation is dominated by upland plant species characteristic of disturbed and forest edge habitat. Dominant plants identified include Scotch Broom (*Cytisus scoparius*), Sword Fern (*Polystichum munitum*), Himalayan Blackberry (*Rubus bifrons*), and native and non-native grasses. Port Angeles Substation (Township 30 North, Range 06 West, Section 14) is in an urban area surrounded by private residences and a state college.

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

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

Potential for Significance: No

Explanation: BPA determined that the proposed work would result in no adverse effect on historic properties [§36 CFR 800.5(b)]. The Washington Department of Archaeology & Historic Preservation concurred with BPA's determination, while the Makah Nation, Jamestown S'Klallam Tribe, and Lower Elwha Klallam Tribe had no comments. Section 106 consultation was completed on February 27, 2025.

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

Potential for Significance: No with Conditions

Explanation: Where trenching would occur, geology and soils have been previously disturbed by highway construction and the installation of above- and below-ground utilities. Lumen would comply with WSDOT's Temporary Erosion and Sediment Control Manual (M 3103.01) to control and/or mitigate runoff and erosion resulting from the work. Furthermore, Lumen would restore the drainage to its original condition. Therefore, the project would not have a significant impact on geology or soils.

Notes:

- BPA will complete a Pollution Abatement Clearance prior to disposing of any excavated material offsite.

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

Potential for Significance: No

Explanation: Vegetation would be crushed and removed by trenching within the right-of-way of Highway 101.. No special-status plant species were found nor are any special-status plant species known to occur in this area. Furthermore, all areas disturbed by construction would be restored by composing, seeding, fertilizing, mulching, and/or additional planting, as determined by WSDOT. Therefore, the project would not have a significant impact on plants.

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

Potential for Significance: No

Explanation: The project would have a small, temporary impact to wildlife due to elevated noise from heavy equipment. This noise would occur for 1-2 days during trenching work and may be detectable within a 0.25-mile of the project area. However, this would not affect Northern spotted owl or marbled murrelet for the following reasons: 1) there is no suitable nesting habitat nor documented occurrences for these species within 0.25-mile of the project area; and 2) construction noise would be within the range of noises typically heard from the highway or substation, and any birds present would be habituated to this level of ambient sound. There is no designated critical habitat for ESA-listed species within the project area. Therefore, this project would not have a significant impact on wildlife.

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

Potential for Significance: No

Explanation: Lumen would comply with WSDOT's Temporary Erosion and Sediment Control Manual (M 3103.01) to control and/or mitigate runoff and erosion resulting from the work and would restore the drainage to its original condition and function. Furthermore, Lumen will have a Temporary Water Pollution/Erosion Control Plan (TESC) and a Spill Prevention, Control, and Containment Plan (SPCC) that would be reviewed by WSDOT. Therefore, drainage would be adequately controlled and restored so there would be no impact on water bodies, floodplains, or fish.

#### **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are present within the project area. See #5 for details on how Lumen would control drainage to prevent impacts on any nearby wetlands.

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

Potential for Significance: No

Explanation: Trenching would not be deep enough to reach groundwater or aquifers. See #5 for details on how Lumen would control drainage to prevent impacts to groundwater and aquifers. Any spills would be addressed immediately and follow BPA protocol for cleanup and regulatory notification.

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

Potential for Significance: No

Explanation: The proposed work is consistent with existing land use. There are no specially-designated areas within the project area.

## 9. Visual Quality

Potential for Significance: No

Explanation: There would be no lasting change to visual quality.

## 10. Air Quality

Potential for Significance: No

Explanation: The project would have a minimal impact on air quality related to the use of machinery during construction. There would be no lasting change to air quality.

## 11. Noise

Potential for Significance: No

Explanation: Noise disturbance from construction would be of short duration and would be similar to ambient conditions near the highway and on the substation.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Lumen would follow a traffic control plan approved by WSDOT. During construction, an on-site WSDOT representative would have the authority to stop work if they determine that extra shoring is needed for worker safety. Standard construction best management practices would be used to avoid human health and safety incidents.

### 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: Work would occur on BPA fee-owned land and within the right-of-way of Highway 101. Lumen has obtained a permit from WSDOT (06157R Amend No. 37) for the work within the WSDOT right-of-way. Lumen would coordinate with residences and maintain driveway access during the work (Traffic Control Plan, Job # P.256543.C.45).

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

Signed:

Jillian Cosgrove  
Environmental Protection Specialist