

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY25 Keeler-Forest Grove Expedited Priority Pole Restricted Construction Method

Project No.: 6849

Project Manager: Amanda Williams, TEPL-TPP-1

Location: Washington County, Oregon

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 two deteriorating wood pole structures and any associated hardware and guys at a location in BPA's Chemawa District. The two structures proposed for replacement are Keeler-Forest Grove #1 and #2 structures 4/4. For the structures, the work would include removing the existing wood poles (and guy wires if present) and replacing them with in-kind in the same location. The work area would be approximately 200 feet by 50 feet at each structure replacement location. Fire wraps would also be added to poles if required. Existing access roads and staging areas would be used.

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 review¹.

/s/ Jonnel Deacon

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

/s/ Katey C. Grange

Katey C. Grange

NEPA Compliance Officer

Date: June 11, 2025

Attachment(s): Environmental Checklist

¹ 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 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.

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Project Site Description

The two structures being replaced are in a transmission line right-of-way on privately owned land that is maintained as agricultural land in western Oregon.

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 would occur during wood pole replacement. Standard construction erosion control measures would be utilized as necessary to minimize soils from traveling outside of the work areas.

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 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

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.

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 600 feet) would ensure that sedimentation would not enter into any water body.

6. Wetlands

Potential for Significance: No with conditions

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 and work is proposed to occur during the dry season when interactions with groundwater would be minimized.

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 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 the landowner.

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

Date: June 11, 2025

Jonnel Deacon

Physical Scientist - EPR-Olympia