

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** North Bonneville-Troutdale No. 1 and North Bonneville-Ross No. 1 Insulator Replacements

**Project No.:** P02477

**Project Manager:** Andrew Young, TEPL-CSB-2

**Location:** Clark and Skamania counties, Washington

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

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to replace insulators and associated hardware and to install fall protection on steel lattice transmission structures in line miles 1 to 22 on the 230-kilovolt (kV) North Bonneville-Troutdale No. 1 and the 230-kV North Bonneville-Ross No. 1 transmission lines in Skamania and Clark Counties, Washington. Mechanical and electrical stresses have degraded the existing insulators and hardware, which could lead to unplanned outages from flash-overs and mechanical failures. Furthermore, the transmission structures lack fall protection that enable transmission line workers to safely climb structures. Therefore, the proposed project is required to ensure the integrity and reliability of the transmission lines and worker safety.

BPA would replace insulators and hardware (e.g., dampers, suspension insulator strings, clamps, armor rods, and/or drop forged hangers) on every existing transmission structure that requires it (some insulators and hardware have been replaced more recently and do not require replacement at this time). Fall protection would also be installed on all structures that do not currently have it. Bucket trucks and line trucks would be used to access the transmission structures and to complete the work. Temporary cribbing could be used to level and stabilize the truck out-riggers. Helicopter(s) would be used to transport new insulators and equipment to the structures from landing zones established at previously-disturbed locations near the transmission line right-of-way (ROW). Helicopter use would not be permitted between structures 1/1 and 9/6.

Some minor maintenance of existing access roads and landings would be required at select locations to make them suitable for use. Within existing road prisms and landings, BPA would conduct light road grading (i.e., smoothing, reshaping, and filling irregularities), add gravel, and mow and/or clear vegetation. These proposed maintenance activities would not require or include the construction of new access roads, landings, or drainage features beyond those areas previously disturbed in the established road prism. General equipment used for this type of maintenance work includes graders, rollers, bull-dozers, brush hogs, excavators, and dump trucks. Materials and equipment would be staged in previously-disturbed locations along the ROW.

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>

FOR

Walker Stinnette  
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 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:** North Bonneville-Troutdale No. 1 and North Bonneville-Ross No. 1 Insulator Replacements

## **Project Site Description**

The project site includes BPA's existing ROW from structures 1/1 to 19/3 on the North Bonneville-Ross No. 1 and North Bonneville-Troutdale No. 1 transmission lines in Clark and Skamania counties, Washington. Work would occur on BPA fee-owned property or within BPA's existing transmission line and access road easements on private, forested land, and land managed by the State of Washington for recreation, conservation and silviculture. The lands managed by the State of Washington include parts of Beacon Rock State Park and campground (line miles 3-5). Temporary helicopter landing zones would be located in previously-disturbed areas adjacent to the transmission line ROW where BPA has acquired permission from the underlying landowner. Vehicles and equipment would primarily be operated on existing gravel access roads and landings, with some off-road travel required for short distances. Access road and landing maintenance activities would occur within the established and previously-disturbed road prisms and landings. Vegetation within the right-of-way consists of a mix of common, low-growing shrubs and grasses that are periodically mowed or treated with herbicides as part of routine transmission line maintenance. No wetlands or surface waters are located within or near work areas. In the east, the project site is surrounded by undeveloped coniferous forests in various stages of succession due to historic and ongoing timber harvest. Similarly, the western portion is surrounded by timber lands and rural residential development. The eastern portion of the ROW is located within the Columbia River Gorge National Scenic Area (CRGNSA) on lands designated as Urban Areas (General Management Area [GMA]), Forest (Special Management Area [SMA]), Public Recreation (SMA), and Open Space (SMA).

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

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

Potential for Significance: No

Explanation: On February 27, 2024, BPA initiated National Historic Preservation Act, Section 106 consultation with the following parties:

- US Forest Service CRGNSA
- Confederated Tribes and Bands of the Yakama Indian Reservation
- Confederated Tribes of Grand Ronde
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of the Warm Springs Reservation of Oregon
- Cowlitz Indian Tribe
- Gifford Pinchot National Forest
- Nez Perce Tribe
- Washington Department of Natural Resources
- Washington State Parks and Recreation Commission
- Washington Department of Archaeology and Historic Preservation (DAHP)

BPA conducted background research and an intensive field survey of the Area of Potential Effects (APE). The research and survey identified five archaeological resources and five historic BPA assets that were previously documented in the APE as well as two historic period archaeological resources and one built resource that were newly documented. These newly identified resources were recommended as not eligible for inclusion in the National Register of Historic Places (NRHP) due to lack of important associations under any of the criteria. BPA's historic assets that have been determined eligible for inclusion in the NRHP include North Bonneville Substation and the North Bonneville-Troutdale No. 1, North-Bonneville-Ross No.1, North Bonneville-Troutdale No. 2, and Bonneville PH-Alcoa No. 1&2 transmission lines. Insulator replacements are considered normal, in-kind, repair work that does not negatively impact the integrity of these types of resources. No ground disturbing work would occur near any of the archaeological resources.

Therefore, as per §36 CFR 800.5(b), BPA determined on November 8, 2024, that the implementation of the proposed undertaking would result in no adverse effect to historic properties (BPA Project No.: WA 2024 019; DAHP Log No.: 2024-02-01407). Concurrence was received from DAHP on November 12, 2024. No other comments were received from the consulting parties.

Notes:

- Implement the Post Review Discovery Procedure in the unlikely event that cultural material is inadvertently encountered during implementation. Discontinue all ground-disturbing activity 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: The proposed action would primarily occur within existing gravel access road prisms and landings, where a road-base of rock already exists. No construction of new access roads, landings, or drainage features would be required beyond those areas previously disturbed in the established road prisms and landings. Off-road vehicle travel for short distances and vegetation mowing could cause minor and temporary soil disturbance and compaction. These actions are not anticipated to result in significant erosion or permanent soil impacts. Standard construction best management practices (BMPs) would be implemented, as necessary to prevent erosion and sedimentation and to stabilize the site following completion of construction. The proposed action would not impact geology.

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

Potential for Significance: No

Explanation: The proposed action would primarily occur within existing gravel access road prisms and landings, where little to no vegetation is present. In the limited areas where vegetation is present (e.g., within access roads and landings, where off-road vehicle travel is required, where mowing or grubbing is required as part of access road maintenance) vegetation would either be crushed and left in place or mowed to minimize wildfire risk. Standard construction BMPs would be implemented, as necessary to prevent the spread of noxious weeds and to revegetate temporarily disturbed areas. No Federal or state special-status plant species or habitats are documented within or near the project site.

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

Potential for Significance: No with Conditions

Explanation: The proposed action could result in minor and temporary wildlife disturbance from elevated noise and human presence during implementation. Designated northern spotted owl critical habitat is present near the eastern portion of the project site, between structures 1/1 and 3/2. Potentially suitable northern spotted owl nesting habitat is modeled between

structures 8/1 and 9/3 and between structures 4/2 and 5/3. However, given the predominance of relatively young forest stands, it is likely that typical nesting habitat for spotted owls is not present. Furthermore, the closest documentation of nesting northern spotted owl is over three miles from the project site and was recorded in 1994. To avoid effects to nesting northern spotted owl and designated critical habitat, BPA would adhere to the conservation measures below. It is expected that most wildlife species would likely be tolerant to the proposed level of activity given ongoing surrounding land uses, primarily undeveloped timber and forested lands, which provide ample adjacent habitat if an animal is disturbed by project activities. In addition, most wildlife species would likely be able to avoid work areas and would reoccupy the site following completion of the proposed action. There would be no permanent impacts to special-status wildlife or habitats. No other Federal or state special-status wildlife species or habitats are documented within or near the project site.

Notes:

- Prohibit helicopter use between structures 1/1 and 9/6.
- Prohibit construction activities between structures 1/1 and 3/2 until after the northern spotted owl critical nesting period (March 1 – July 15). Construction in this area may proceed after July 15.

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

Potential for Significance: No

Explanation: No water bodies, floodplains, or special-status fish species are present within or near work areas. Standard construction BMPs would prevent indirect impacts to these resources, if present outside of work areas. Therefore, the proposed action would not impact water bodies and floodplains and would have no effect on special status fish species or habitats.

## **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are present within or near work areas. Standard construction BMPs would prevent indirect impacts to wetlands, if present outside of work areas. Therefore, the proposed action would not impact wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: The proposed action would not result in ground disturbance that could reach depths to ground water or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

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

Potential for Significance: No

Explanation: The project is located within the CRGNSA. The proposed action would primarily occur within existing gravel access road prisms and landings and would not result in a change in land use would not change as a result of project activities. The project meets the criteria for the National Scenic Area Act "Savings Provision," which allows BPA to operate, maintain and modify existing transmission facilities within the CRGNSA. BPA coordinated with the U.S. Forest Service CRGNSA office on February 28, 2025 to confirm understanding. No response was received.

Certain locations within the project are located within lands managed by the State of Washington. All work would occur on existing BPA easements and access roads outside of the public recreational use areas. No helicopter activity is planned for those locations with the potential to disturb the Beacon Rock State Park or campground, or other high-use recreational areas on State of Washington managed-lands. Ground-based installation would create a short-term source of intermittent construction noise, but noise would be limited to daylight hours and only last less than 1 day per structure.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The presence of vehicles and equipment and minor vegetation disturbance would cause temporary visual impacts. The new insulators would be a slightly different color and material than the existing conductors. However, this change would be minor and would not be overtly noticeable. Access road maintenance would occur within existing road prisms, approaches, and landings. The final appearance of the project site would be consistent with the existing visual quality.

## **10. Air Quality**

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and vehicle emissions. There would be no long-term change in air quality following completion of the proposed action.

## **11. Noise**

Potential for Significance: No

Explanation: The proposed action would result in minor and temporary noise that would intermittently exceed current ambient conditions. Project-related noise could be audible from properties located near the transmission line ROW. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7 AM to 7 PM). Work would progress quickly along the transmission line with noise impacting a given area for no more than a few days. There would be no long-term change in ambient noise following completion of the proposed action.

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

Potential for Significance: No

Explanation: All standard safety protocols would be followed throughout implementation of the proposed action to minimize risk to human health and safety. Therefore, the proposed action would not be expected to impact human health and safety.

### **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: The proposed action would occur on BPA property or in areas where BPA has acquired all necessary rights. BPA has notified and been in coordination with underlying landowners and managers and would continue to coordinate as necessary throughout the proposed action. No additional landowner notification, involvement, or coordination would be required.

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

Signed:

Walker Stinnette  
Environmental Protection Specialist

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