

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Port Angeles-Sappho No. 1 Access Road Upgrade: Phase 1

Project No.: P05228

Project Manager: Donna Martin, TELF-TPP-3

Location: Clallam County, Washington

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine maintenance; B1.13 Pathways, short access roads, and rail lines

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to improve and reconstruct existing access roads, construct new access roads, and stabilize landslides within line miles 26 through 31 of BPA's 115-kilovolt (kV) Port Angeles-Sappho No. 1 transmission line in Clallam County, Washington. The proposed action is required to ensure vehicles and equipment can reliably access the transmission line for maintenance and operations. Some of these access roads also constitute segments of FS-30, which provides an important alternative tsunami evacuation route.

Localized landslides have damaged three BPA access roads (028-05-2, 028-05-4, and 028-06-2) near structures 28/5 to 28/7. To stabilize these landslides and reestablish access, the following actions are proposed:

- ***Access Road 028-05-2:*** stabilize slopes below the road with light, loose riprap.
- ***Access Road 028-05-4:*** decommission the existing access road and construct a new approximately 200-foot-long access road 028-05-3 to reroute around an existing large landslide. New access road construction would include clearing and grubbing to remove all vegetation, stumps, and debris from the road corridor; cutting, filling, grading, and compacting to establish the road base; and then laying, shaping, and compacting gravel to form the road surface. The uphill slope would also be regraded to 1.5:1, and the downhill slope would be regraded to a 2:1 slope. To decommission 028-05-4, light shaping or grading and potentially importing fill material would be required to establish a more natural contour, and then area would be seeded.
- ***Access Road 028-06-2:*** construct one new 5-foot-tall concrete block retaining wall (approximately 105-feet-long) on the downhill side of the road and construct two new 6-foot-tall gabion basket retaining walls (approximately 40-feet-long and 30-feet-long) on the uphill side of the road.

Approximately 0.5 acres of vegetation, including 192 trees, would be removed to stabilize the landslides and to establish the new road.

BPA would reconstruct approximately 3.3 miles and would improve approximately 5.2 miles of existing access roads. Access road reconstruction is required where an existing road prism is present, but in poor condition and potentially impassable. Reconstruction would include clearing vegetation and debris, reestablishing the road base, and reconstructing the road surface, similar to new access road construction. Access road improvement would occur within the existing access road prisms and would include minor grading of the road base and laying, shaping, and compacting gravel in select locations. Common drainage features (e.g., ditches, cross-drain culverts, water bars, and drain dips) would be repaired, replaced or installed new. BPA would also repair, reconstruct, or install new landings at the bases of transmission structures, vehicle pullouts and turn-arounds, and gates.

The standard width of the finished road prism is 14 feet, with up to approximately 3 feet of additional disturbance on either side of the road for ditches, side casting, road ditch out-sloping, rolling dips, and/or other related construction activities. Therefore, the total disturbed width for typical BPA access roads would be approximately 20 feet, except where additional width would be necessary for turn radii and cut and fill slopes. BPA would clear and grub vegetation, as needed, within the 20-foot-wide road corridor. An excavator would likely be used to clear and grub shrubs and saplings growing along the road and to break smaller branches growing into the roadway. Chainsaws could be required to remove larger woody vegetation and limbs growing into the roadway.

BPA would also install two new bridges, one new ford, and one new stream culvert and would replace two stream culverts in locations where an access road crosses a perennial or intermittent stream. If anadromous or resident fish are not present, then the bridges and stream culverts would be designed to meet the hydrologic conditions of the watershed (i.e., large enough to pass the 100-year flood event). In streams that have historical, current or potential presence of anadromous or resident fish, the bridges and stream culverts would meet or exceed NMFS' anadromous salmonid passage facility design criteria to allow passage of all life stages of anadromous fish. Fords would have a hardened surface (rock) buried below the natural stream substrate with stream simulation materials placed at grade. All stream culvert and ford construction areas would be isolated from flowing water by a gravity diversion or pumping water around the site or construction would occur when intermittent streams are dry. Bridge construction activities, including abutment installation, would occur above the ordinary high watermark.

The proposed action would require the use of heavy equipment, including graders, rollers, bulldozers, excavators, backhoes, dump trucks, cranes, chainsaws (for tree removal), and light-duty trucks. During construction, materials and equipment would be staged within previously disturbed areas at intervals along the access roads.

Findings: In accordance with Section 1021.102 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; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and the current *DOE National Environmental Policy Act (NEPA), Implementing Procedures*, BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

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

Walker Stinnette
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

Categorical Exclusion Environmental Evaluation

This evaluation 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 No. 1 Access Road Upgrade: Phase 1

Project Site Description

The project site includes access roads, transmission line right-of-way (ROW), and undeveloped forested areas associated with line miles 26 to 31 of BPA's 115-kV Port Angeles-Sappho No. 1 transmission line in the U.S. Forest Service (USFS) Olympic National Forest in Clallam County, Washington (Township 30 North, Range 10 West, Sections 01, 02, 03, 08, 37, and 41). Undeveloped areas are predominantly comprised of secondary successional coniferous forests of western hemlock (*Tsuga heterophylla*) and western red cedar (*Thuja plicata*) with some red alder (*Alnus rubra*) as a secondary component and an understory consisting of common native shrubs and herbs. Canopy cover is high with some isolated remnant trees exceeding 100 years old, but not in the concentration necessary for the forest to be considered old growth or mature. The transmission line ROW is regularly maintained to prevent the growth of trees and is dominated by salmon raspberry (*Rubus spectabilis*) and salal (*Gaultheria shallon*), and other common native shrubs and herbs. Non-native weeds are also present in the project site, including Scotch broom (*Cytisus scoparius*), bull thistle (*Cirsium vulgare*), Robert geranium (*Geranium robertianum*), and ox-eye daisy (*Leucanthemum vulgare*). Work areas on the Olympic National Forest would be accessed via the existing road network, which crosses Washington Department of Natural Resources (Washington DNR) properties in some locations. The area outside of the project area is predominantly used for timber harvest.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: On September 12, 2022, BPA initiated National Historic Preservation Act, Section 106 consultation with the following parties:

- Jamestown S'Klallam Tribe
- Lower Elwha Klallam Tribe
- Makah Nation
- USFS – Olympic National Forest
- Washington Department of Archaeology and Historic Preservation (DAHP)
- Washington DNR

BPA conducted background research followed by a pedestrian survey and subsurface testing of the Area of Potential Effects (APE). No archaeological resources were identified within the APE. Although the historic Port Angeles-Sappho No. 1 is eligible for inclusion in the National Register of Historic Places (NRHP), BPA determined that the proposed action would not adversely affect the eligibility of the transmission line. Therefore, on May 15, 2023, BPA determined that the proposed action would result in no historic properties affected (BPA Project No.: WA 2022 052; DAHP Log No.: 2022-09-06010-BPA). Concurrence with BPA's determination was received from the Lower Elwha Klallam Tribe and from DAHP on May 15, 2023. 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 permanently impact soils from the construction of approximately 200 feet of new access road and from installing retaining walls and adding riprap to stabilize landslides. The decommissioned access road would be graded and shaped to match the surrounding grade and then seeded. Additional ground disturbance would be limited to the margins of the existing 14-foot-wide road prisms within the existing 20-foot-wide road corridor. Standard construction best management practices (BMPs) would be implemented to minimize soil erosion, sedimentation, and fugitive dust, as appropriate. Temporarily disturbed areas would be seeded to stabilize exposed soils and would eventually return to pre-existing conditions following completion of the proposed action. The proposed action would not impact geology.

Notes:

- Fill material generated from the project site, containing or suspected to contain invasive plants, shall be stockpiled within the project area and as close to the infested source area as possible. The material shall not be broadcast for disposal.

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

Potential for Significance: No

Explanation: The proposed action would clear and grub vegetation, as needed, within the 20-foot-wide access road corridor and would clear approximately 0.5 acres of vegetation, including approximately 200 trees, to stabilize landslides and construct a new access road. BPA conducted vegetation and habitat surveys in Spring 2025, and no special-status plant species, including species managed by the USFS, were identified within the project site. Four species of noxious weed were identified in work areas. Standard construction BMPs as well as herbicide treatment pre- and post-construction would minimize the spread of noxious weeds. Temporarily disturbed areas would be reseeded and would return to similar conditions following completion of the proposed action. Therefore, the proposed action would have no effect on special-status plant species or habitats.

Notes:

- All material (e.g. gravel, sand, straw) transported to the project site shall be obtained from weed-free sources. The construction contractor shall coordinate with USFS Olympic National Forest to verify that materials are weed free.
- Vehicles and mechanized equipment shall be cleaned of dirt/mud, seeds, and other plant parts prior to arriving at the project site.
- If operating in an area infested with noxious weeds, clean all vehicles and mechanized equipment before moving between sites or leaving the project area.
- The locations of known noxious weed infestations would be provided to BPA's contractor and clearly marked with flagging in the field, if necessary.
- BPA's contractor will treat known noxious weed infestations with herbicide prior to construction, and BPA's vegetation management crews will treat within one year after construction. Consult the USFS Olympic National Forest for guidance on approved herbicides.
- Seed mixes will originate from locally sourced (foundation seed must have originated from the Olympic peninsula), genetically appropriate material consisting of native species. Consult the USFS Olympic National Forest for guidance on appropriate seed mixes.

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

Potential for Significance: No

Explanation: The proposed action would clear and grub vegetation, as needed, within the 20-foot-wide access road corridor and would clear approximately 0.5 acres of vegetation, including approximately 200 trees, to stabilize landslides and construct a new access road. Minor and temporary wildlife disturbance could occur from elevated noise and human presence during construction. It is expected that most wildlife species that could be present would be able to avoid the project sites during construction and would likely reoccupy temporarily disturbed areas following completion of the proposed action.

The project site is within designated critical habitat for northern spotted owl (*Strix occidentalis caurina*) and marbled murrelet (*Brachyramphus marmoratus*). Therefore, BPA determined that the proposed action would be Likely to Adversely Affect northern spotted owl and marbled murrelet critical habitat. BPA conducted wildlife and habitat surveys in Spring 2025, and no special-status wildlife species, including species managed by the USFS, were identified within the project site. Rather than conducting species-specific surveys, BPA assumed both species are present in the project area. BPA determined that the proposed action would be Not Likely to Adversely Affect northern spotted owl and would be Likely to Adversely Affect marbled murrelet. BPA coordinated with the USFS Olympic National Forest to determine that the proposed action would be consistent with the finding of effects to species listed under the Endangered Species Act as analyzed in the existing USFS programmatic biological opinion. The proposed action would have No Effect on any other special-status species or habitats.

Notes:

- No project activities shall occur within the two hours of (before and after) sunrise and sunset during the marbled murrelet nesting season (April 1 to September 23).

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

Potential for Significance: No

Explanation: BPA delineated the ordinary high water mark of all streams in the project site and determined that the proposed action would impact approximately 0.01 acre of waters. The U.S. Army Corps of Engineers (USACE) confirmed that impacts are authorized under *Nationwide Permit (NWP) 14, Linear Transportation*. Washington Department of Ecology confirmed that no individual Section 401 Water Quality Certification is required.

No special-status fish species are present within or near the project site. The project site does overlap with essential fish habitat for Chinook (*Oncorhynchus tshawytscha*) and coho (*Oncorhynchus kisutch*). On December 4, 2025, BPA determined that the proposed action is consistent with the finding of effects to ESA-listed species and essential fish habitat analyzed in the existing programmatic biological opinion for routine access road maintenance activities (WCR-2014-1600). Concurrence with BPA's findings was received from the National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) on December 4, 2025. The proposed action would have No Effect on special-status fish species.

Notes:

- BPA and BPA's contractor shall comply with all terms and conditions outlined in NWP-14 and the NOAA Fisheries programmatic biological opinion.
- All in-water work would occur during the approved work window for fish protection, between July 16 and September 15.
- Before ground disturbance or entry of mechanized equipment or vehicles into the construction area, the OHWM of all waterbodies would be provided to BPA's contractor and clearly marked with flagging in the field, if necessary.
- Deposit excavated sediments in upland locations that are not hydrologically connected to any stream or wetland. Stabilize excavated sediment with temporary erosion and sediment controls and/or reseeded to prevent migration off-site.

- Refuel, repair, maintain, and store all mechanized equipment at least 150 feet from streams and wetlands.
- Inspect vehicles and mechanized equipment for fluid leaks prior to leaving the staging area. If a leak is found, the vehicle or equipment would be repaired and cleaned before resuming operation.
- Minimize disturbance of existing vegetation in ditches and at stream crossings.
- Do not enter wetted stream channels with mechanized equipment except where no practicable alternative exists.

6. Wetlands

Potential for Significance: No

Explanation: BPA delineated the boundaries of all wetlands in the project site in Spring 2025 and determined that the proposed action would impact approximately .04 acre of wetlands. The USACE confirmed that impacts from the proposed action are authorized under *Nationwide Permit (NWP) 14, Linear Transportation*. Ecology confirmed that no individual Section 401 Water Quality Certification is required.

Notes:

- BPA and BPA's contractor shall comply with all terms and conditions outlined in NWP-14.
- Before ground disturbance or entry of mechanized equipment or vehicles into the construction area, all wetland boundaries would be provided to BPA's contractor and clearly marked with flagging in the field, if necessary.
- Deposit excavated sediments in upland locations that are not hydrologically connected to any stream or wetland. Stabilize excavated sediment with temporary erosion and sediment controls and/or reseeded to prevent migration off-site.
- Refuel, repair, maintain, and store all mechanized equipment at least 150 feet from streams and wetlands.
- Inspect vehicles and mechanized equipment for fluid leaks prior to leaving the staging area. If a leak is found, the vehicle or equipment would be repaired and cleaned before resuming operation.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance would not reach depths to groundwater, and standard construction BMPs would reduce the potential for inadvertent spills of hazardous materials that could contaminate groundwater 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 proposed action would clear approximately 0.5 acres of undeveloped forested land for the construction of a new, approximately 200-foot-long segment of access road. The new access road segment would restore usage of the USFS road FS-30, which was damaged by a landslide. Therefore, the proposed action would be consistent with existing land use.

The proposed action would have effects on coastal uses or resources in Washington's coastal zone. As such, BPA prepared a consistency determination to document that the proposed action is consistent to the maximum extent practicable with the enforceable policies of the state's Coastal Zone Management Program (CZMP). On February 5, 2026, Washington Department of Ecology concurred with BPA's determination that the proposed action would be consistent with Washington's CZMP.

9. Visual Quality

Potential for Significance: No

Explanation: During construction, the presence of construction equipment and general construction activities would cause temporary visual impacts. Clearing vegetation, including approximately 0.5 acres of undeveloped forested land, stabilizing landslides, and constructing a new access road would cause permanent visual impacts. However, the project site is in a remote and undeveloped area of the Olympic National Forest, and few individuals would likely notice these changes. The final appearance of the project site would be consistent with the existing visual quality of the transmission line right-of-way and access road network.

10. Air Quality

Potential for Significance: No

Explanation: The proposed action would cause a minor and temporary increase in dust and emissions in the local area. 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 from vehicles and equipment, and general construction activities, which would intermittently exceed current ambient conditions. The project site is in a remote and undeveloped area of the Olympic National Forest with no noise-sensitive properties or land uses nearby. 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 USFS-managed land, and BPA has acquired (or would acquire) all necessary rights. BPA has notified and been in coordination with USFS and would continue to coordinate as necessary throughout the proposed action.

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