

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Snohomish Priority Pole FY22-24 Phase 1

**PP&A No.:** 6952

**Project Manager:** Christine Sullivan – TEPL-CSB-2

**Location:** San Juan, Skagit and Snohomish counties, WA

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

## **Description of the Proposed Action:**

BPA proposes to replace deteriorating wood poles and associated structural/electrical components (cross arms, insulators, guy anchors, etc.) at 12 structure locations within the Fidalgo-Lopez Island No. 3, Murray-Custer No. 1, Snohomish-Beverly Park No. 3 and 4, and Snohomish-Murray No. 1 transmission lines, in San Juan, Skagit and Snohomish counties, WA (see table 1). Replacement would be in-kind and would be placed in the immediate vicinity of the original structure. An auger would be used to excavate the new hole prior to new wood pole placement. Poles identified as needing culvert/wrap treatment would be installed within a vertical corrugated metal pipe (CMP) with rock base and an impermeable barrier wrap to prolong service life. Existing access roads would be used. No new access roads, landings or workspaces would be required.

LINE NAME	Structure	Treatment
Fidalgo-Lopez Island No 3	6/18	
	6/20	
Murray-Custer No 1	26/7	
Snohomish-Beverly Park No 3	3/6	culvert/wrap
Snohomish-Beverly Park No 4	3/4	culvert/wrap
	5/8	
Snohomish-Murray No 1	1/2	culvert/wrap
	1/10	
	2/5	
	6/3	
	17/8	
	18/4	

Table 1. Snohomish Priority Pole List

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 1021.102 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.

*/s/ Justin Carr*  
Justin Carr  
Physical Scientist (Environmental)

Concur:

*/s/ Katey C. Grange*  
Katey C. Grange                      Date: June 11, 2026  
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:** Snohomish Priority Pole FY22-24 Phase 1

## **Project Site Description**

The proposed project area encompasses the immediate vicinity surrounding structures on the Fidalgo-Lopez Island No. 3, Snohomish-Beverly Park No. 3 and 4, and Snohomish-Murray No. 1 transmission lines. Land use in the surrounding area consists of public utility right-of-way, suburban and rural private lands. Elevation within the proposed project area ranges from approximately 5 to 500 feet.

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

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

Potential for Significance: No

Explanation: The proposed actions were found to have no adverse effect to historic properties. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, on March 24, 2026, BPA initiated consultation with: the Lummi Nation, Nooksack Indian Tribe, Samish Indian Tribe, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Sauk-Suiattle Indian Tribe, Snoqualmie Indian Tribe, Stillaquamish Tribe of Indians, Tulalip Tribes, and the Washington State Department of Archaeology and Historic Preservation (DAHP). The DAHP responded to the determination of effects on March 25, 2026. No additional responses were received from the consulting parties within 30 days.

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

Potential for Significance: No

Explanation: Localized disturbance would occur during wood pole installations. Standard construction control measures would be utilized as necessary.

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

Potential for Significance: No

Explanation: No federal or state special status species are identified within the proposed project area. Project activities would be limited to within existing managed transmission line rights-of-way (ROW) and associated access roads. No new landings or roads would be constructed.

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

Potential for Significance: No

Explanation: The proposed project area does not include critical habitat for any federal or state sensitive species. Project activities that would crush or remove vegetation would be limited

to localized areas immediately surrounding replacement poles and existing managed transmission line ROW and associated access roads. Proposed work would not alter existing conditions; therefore, BPA has determined there would be no effect to ESA listed species including: marbled murrelet, yellow-billed cuckoo, northwestern pond turtle, island marble butterfly, and the proposed threatened monarch butterfly.

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

Potential for Significance: No

Explanation: No in-water work is proposed. Standard construction erosion control measures would be implemented as necessary to ensure sediment and other contaminants do not enter water bodies. Therefore, BPA has determined there would be no effect to ESA listed fish species bull trout and Dolly Varden

## **6. Wetlands**

Potential for Significance: No with Conditions

Explanation: Ground matting would be utilized for any structures located within identified wetland habitat. Matting would be removed immediately following construction, and not in place for longer than 3 days.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Project would adhere to appropriate best management practices to prevent impacts to groundwater. Pole excavations would not extend to a depth of groundwater.

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

Potential for Significance: No

Explanation: No specially designated areas were identified within the project area. Land use would not change or be disrupted as a result of proposed project activities.

## **9. Visual Quality**

Potential for Significance: No

Explanation: No impact to visual quality. New structures would be consistent and within footprint of existing structures.

## **10. Air Quality**

Potential for Significance: No

Explanation: The project would have low, temporary impact from vehicle emissions associated with construction equipment.

## 11. Noise

Potential for Significance: No

Explanation: Some temporary noise associated with construction equipment would occur within daylight hours.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed project would occur away from major population centers and the work would be temporary and minimally invasive.

### 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: Landowners have been notified and coordinated through BPA realty.

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

Signed: /s/ Justin Carr      Date: June 11, 2026  
Justin Carr  
Physical Scientist (Environmental)