

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Cowlitz PUD Pole Replacements at Lexington Substation

**Project No.:** LURR 20200126

**Project Manager:** Charlene Belt, TERR-ROSS-MHQA

**Location:** Cowlitz County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way; B4.13 Upgrading and rebuilding existing powerlines

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Cowlitz Public Utility District (PUD) to remove and replace three transmission structures and guy wire anchors on BPA's Lexington Substation property, in Kelso, Washington. A 55-foot-tall three-pole wood structure would be removed and replaced with a new 60-foot-tall three pole structure in the transmission right-of-way, located northwest of the substation yard. Cowlitz PUD would then add new conductor to this structure and BPA staff would connect that conductor to equipment within the substation yard. Additionally, two 70-foot and 75-foot single wood poles would also be replaced with 75-foot and 80-foot wood poles, near Shoreview Drive, southwest of the substation yard. Helical anchors and 5/16-inch and 1/2-inch diameter guy wires would be installed for the replacement poles on BPA property, and for another wooden pole to the south, where the replacement pole is off of BPA property, but the guy wire and anchors are on BPA property.

Additionally, two separate access roads on BPA property would be improved by grading and then installing rock on the road surface. These roads are 100-feet-long by 15-feet-wide and 230-feet-long by 15-feet-wide.

**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.

/s/ Beth Belanger

Beth Belanger  
Contract Environmental Protection Specialist  
Flux Resources, LLC

Reviewed by:

/s/ Carol Leiter

Carol Leiter  
Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

October 14, 2020

date

Attachment: Environmental Checklist

## **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: Cowlitz PUD Pole Replacements at Lexington Substation**

#### **Project Site Description**

The project site is on BPA fee-owned property in Kelso, Cowlitz County, Washington. The site is in Section 15, Township 8 North, Range 2 West.

The three-pole structure would be replaced in the right-of-way (ROW) located northwest of Lexington Substation. This area is approximately 0.45 miles north of the Cowlitz River and 0.25 miles north of an unnamed lake. The site slopes slightly to the east. The vegetation in this location consists of snowberry (*Symphoricarpos albus*), cascara (*Rhamnus purshiana*), trailing blackberry (*Rubus ursinus*), manroot (*Marah oreganus*), self-heal (*Prunella vulgaris*), vetch (*Vicia* sp.), cleavers (*Galium* sp.), thistle (*Centaurea* sp.), oxeye daisy (*Leucanthemum vulgare*), orchard grass (*Dactylis glomerata*) and sword (*Polystichum munitum*) and bracken (*Pteridium aquilinum*) ferns.

The 15-foot by 100-foot-road improvement area is an existing unmaintained road. The site has compacted gravel but is overgrown with vegetation consisting of trailing blackberry (*Rubus ursinus*), Himalayan blackberry (*Rubus armeniacus*), reed canary grass (*Phalaris arundinacea*), orchard grass, and wild rose (*Rosa* sp.).

The single pole wooden structure replacements would occur on the southwestern edge of BPA's fee-owned property. The Cowlitz River is located approximately 0.40 miles southeast of this location and the previously mentioned unnamed lake is located approximately 0.10 miles south. The single-pole replacements and road installation would occur in an area that is heavily vegetated with Himalayan blackberry and other non-native species.

There are no waterways or wetlands in, or near, any of the sites.

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

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

Potential for Significance: No

Explanation: On June 11, 2020, the Cowlitz Indian Tribe and Washington Department of Archaeology & Historic Preservation (DAHP) were initially notified of the proposed project location and provided with a map of the project area. On September 3, 2020, DAHP responded that they concurred with BPA's area of potential effect (APE) map. The Cowlitz Tribe did not respond to the initiation letter.

An archaeological survey of the project area was completed in early August. BPA's contract archaeologist determined that there are no historic properties in the APE. A No Potential to Effect Historic Properties determination letter was sent to the consulting parties on September 14, 2020. On September 15, 2020, DAHP concurred with BPA's determination. As of October 14, 2020, the Cowlitz Indian Tribe has not responded to the determination letter.

## **2. Geology and Soils**

Potential for Significance: No

Explanation: The maximum depth of disturbance would be 10-feet deep for pole installation. The new poles would be installed near the existing poles. An auger would be used to excavate the holes for the new pole locations, which further limits the amount of disturbance. The removed soil would be used to backfill around the newly set poles.

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

Potential for Significance: No with Conditions

Explanation: A site visit in June confirmed that there are no ESA-listed plants or habitat in the project areas. There would be no impacts to special-status plants. Soil disturbing activities would remove and crush some of the existing vegetation from the pole replacement activities; however, construction activities would occur in the fall after most plants have senesced, which would further reduce impacts to plants.

Notes:

- Cowlitz PUD would be required to clean equipment and construction vehicles before and after entering new locations to prevent the spread of invasive plants.

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

Potential for Significance: No

Explanation: The project areas do not contain habitat that would support ESA-listed species. Some non-listed wildlife may be temporarily displaced during construction activities but no habitat would be permanently removed from the project area.

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

Potential for Significance: No

Explanation: There are no water bodies, floodplains or fish in, or near, the project area.

## **6. Wetlands**

Potential for Significance: No

Explanation: There are no wetlands in, or near, the project area.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: There would be no impact to groundwater or aquifers because the maximum depth of excavation would be 10-feet or less. Additionally, the project is 20-miles northwest of the Troutdale Sole Source Aquifer System and would therefore not affect that resource.

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

Potential for Significance: No

Explanation: The Lexington Substation property is not within a specially-designated area. The project would have no change to land use.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The pole replacements would not impact the visual quality.

## **10. Air Quality**

Potential for Significance: No

Explanation: There may be a small amount of dust and vehicle emissions during construction; however, there would be no significant changes to air quality during or after construction.

## **11. Noise**

Potential for Significance: No

Explanation: Temporary noise would occur during construction but the impact would be negligible.

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

Potential for Significance: No

Explanation: There would be no impact to human health or safety. Allowing Cowlitz PUD to replace their transmission poles on BPA property would help the PUD improve their system and reduce the potential for electrical outages in the surrounding communities that they serve.

### **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 project would occur on BPA property and does not require landowner notification. However, as a courtesy, Cowlitz PUD would notify the adjacent landowners of the upcoming construction.

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

Signed: /s/ Beth Belanger

Beth Belanger, ECT-4  
Contract Environmental Protection Specialist  
Flux Resources, LLC

October 14, 2020

Date