

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Naselle-Tarlett No. 1 and No. 2 Urgent Structure Replacement Project, 2023

**PP&A No.:** 4897

**Project Manager:** Tina Edwards - TELP-TPP-1

**Location:** Pacific County, WA

**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 deteriorating wood pole structures and any associated hardware and guys on the Naselle-Tarlett No. 1 and Naselle-Tarlett No. 2 115 kV transmission lines in BPA's Olympia (Chehalis TLM) Maintenance District. The project would include thirty six structures on the Naselle-Tarlett No. 1 and 41 structures on the Naselle-Tarlett No. 2 lines. Each of the two transmission lines are approximately 18 miles in length and structure replacements are located throughout each. For all 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.

Where needed, the project would also include improvements to existing access roads and landings associated with the above-mentioned transmission line rights-of-way that currently inhibit access at the specified locations for routine maintenance. Dependent on the structure location and access road conditions, the project may include surface improvements of existing road surfaces and landings (blading & rocking) as well as improvements and in-kind replacements of existing drainage features. Engineering has estimated approximately 8.7 miles (46,300 linear feet) of improvements and 1.8 miles (9,600 linear feet) of reconstruction of access roads would be necessary. Additionally, 1.4 acre (62,500 square feet) of structure site landings would be improved or reconstructed. No new access roads or landings would be installed.

**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/ Greg Tippetts*

Greg Tippetts, EPR-Olympia  
Physical Scientist - Environmental

Concur:

*/s/ Katey Grange*

Katey Grange                      Date: April 27, 2023  
NEPA Compliance Officer

Attachment(s): 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:** Naselle-Tarlett No. 1 and No. 2 Urgent Structure Replacement Project

### Project Site Descriptions

The project would be at a specific locations in Pacific County WA in BPA's Olympia Maintenance District. All work would be done in existing managed rights-of-way and access easements located on Washington State Department of Natural Resources (DNR)-managed lands, US Fish and Wildlife Service (USFWS)-managed lands, private forests, and private agricultural lands. Site specific locations and details are listed in the following table.

Transmission Line	Structure(s)	Township	Range	Section	Land Use
Naselle-Tarlett No. 1	1/7	10N	9W	5	DNR
	3/3	11N	9W	31	Private Forested
	3-9	11N	10W	36	Private Agricultural
	4/3, 4/7	11N	10W	36	DNR
	5/3	11N	10W	26	Private Forested
	6/4	11N	10W	23	Private Forested
	7/4, 7/5, 7/6, 8/1	11N	10W	27	Private Forested
	13/3, 13/4	10N	10W	18	Private Forested
	13/5	10N	11W	12	Private Forested
	13/7, 14/1	10N	11W	13	Private Forested
	14/3, 14/4, 14/5, 15/2, 15/4, 15/8, 15/9, 15/10	10N	11W	14	Private Forested
	15/11, 15/12, 15/14, 15/15, 15/17, 15/18, 16/2	10N	11W	42	Private Forested
16/6, 16/7, 16/10	10N	11W	10	USFWS	
Naselle-Tarlett No. 2	1/3, 1/4	10N	9W	5	Private Forested
	1/7, 1/9	10N	9W	5	DNR
	2/4	11N	9W	32	Private Forested
	3/5, 3/8	11N	9W	31	Private Agricultural
	3/9	11N	10W	36	Private Agricultural
	4/3, 4/7	11N	10W	36	DNR
	5/3	11N	10W	26	Private Forested
	6/6	11N	10W	23	Private Forested
	7/3, 7/8, 7/9, 8/1, 8/2	11N	10W	27	Private Forested
	9/1	11N	10W	28	Private Forested
	9/7, 10/2	11N	10W	32	Private Forested
	10/8	10N	10W	5	Private Forested
	11/4, 11/6	10N	10W	8	USFWS
	13/8, 14/1	10N	10W	19	Private Forested
	14/8, 15/4, 15/5	10N	11W	24	Private Forested

Naselle-Tarlett No. 2, cont.	15/14, 16/12, 16/13, 17/1, 17/2	10N	11W	14	Private Forested
	17/15	10N	11W	10	Private Forested
	18/1	10N	11W	10	USFWS
	18/2, 18/3, 18/5, 18/6, 18/7, 18/8	10N	11W	10	Private Agricultural

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

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

Potential for Significance: No

Explanation: BPA initiated consultation with the Confederated Tribes of the Chehalis Reservation, Cowlitz Indian Tribe, Shoalwater Bay Tribe, U.S. Fish and Wildlife Service, Washington Department of Archaeology and Historic Preservation (DAHP), and Washington State Department of Natural Resources, on 12/27/2022. The DAHP concurred with the Area of Potential Effect (APE) in an email dated 12/27/2022. BPA completed a cultural resources investigation and did not identify historic properties within the APE. For project locations on non-USFWS-managed lands, BPA sent a no historic properties affected determination letter on 2/24/2023. The DAHP concurred with this finding in a letter dated 2/27/2023. No additional responses were received within 30 days. For project locations on USFWS-managed lands, BPA sent a no historic properties affected determination letter on 4/4/2023. The DAHP concurred with this finding in a letter dated 4/4/2023. No additional responses were received within 30 days. If resources are discovered during construction activities, work would cease and the appropriate archaeological resource staff would be contacted.

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

Potential for Significance: No

Explanation: Soil excavation and disturbance would occur at access road and landing improvement and reconstruction work areas on the existing road prism or previously disturbed and developed areas. Work may include improvements of existing road surfaces and landings (blading & rocking) as well as improvements and in-kind replacements of existing drainage features. Storm water BMPs would be used during the project to protect the surrounding area from runoff and erosion issues. Upon completion of project activities, any disturbed sites would be stabilized with native seed mix, or erosion control materials.

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

Potential for Significance: No

Explanation: Work would occur in areas maintained as an open transmission line corridor; minimal vegetation may be removed or crushed at the pole location sites. Some common native and non-native plants at the structure locations may be temporarily impacted. Vegetation disturbance would be superficial and these plants would be expected to recover naturally through propagation and via the existing seed bank in the area. Disturbed sites would be restored with native seed mix.

No special-status plants or Endangered Species Act (ESA)-listed plants would be impacted from project activities. BPA obtained an official species list from U.S. Fish and Wildlife Service (USFWS) on June 7<sup>th</sup>, 2022. No ESA-listed plant species are present in the project area.

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

Potential for Significance: No

Explanation: Structure 16/6, 16/7, and 16/10 on the Nassele-Tarlett No.1 and structures 11/6 and 18/1 on the Nassele-Tarlett No.2 are located on the USFWS National Wildlife refuge. Structure replacement are in kind and disturbance would be limited the immediate area of the pole replacements. Access and equipment setup for structures 16/10 and 18/1 would be from the adjacent paved road. Access and equipment setup for structures 16/6 and 16/7 would be from wooden wetland matting. The matting would protect the underlying vegetation and soils from substantial damage. Structure 11/6 is located on top of a small noel above a wetland area and would be accessed from an existing road. Minor improvements consisting of blading and addition of rock surfacing would be completed at this location. Any wildlife in the immediate work area may be temporarily disturbed by noise and increased human presence at varying times throughout the project. The project would not have any significant or long lasting impact to wildlife habitat within the refuge or other areas of the proposed project.

BPA obtained an official species list for the project location in Pacific County, Washington from the USFWS on March 9<sup>th</sup>, 2023. Work would occur in areas maintained as an open transmission line corridor and access roads with little wildlife habitat. Road reconstruction work would be confined to the existing right-of-way and access road easements. No ESA species have been documented to occur within ¼ mile of the project locations.

Two structure replacement locations, 4/3 and 4/7 are located with the boundaries of Marbled Murrelet designated critical habitat. No work outside of the cleared right-of-way or tree removal would occur during this project. Additionally the habitat along the transmission line corridor in these areas is not consistent with habitat characteristics suitable for the species. As a conservation and avoidance measure, work in these areas will adhere to the dawn and dusk timing restrictions of no work before two hours after sunrise, and no work within two hours of sun set. BPA has determined that the projects would have “no effect” on ESA listed species or their critical habitat. No other special-status wildlife would be impacted by project activities.

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

Potential for Significance: No

Explanation: No water bodies listed as habitat for anadromous fish including any Federal/state special-status species are located near the project site locations. Several small drainage creeks are located throughout the project area. The project does not include any in water work. All disturbed areas would be protected from runoff by use of appropriate BMPs during the project and stabilized upon completion of project activities.

#### **6. Wetlands**

Potential for Significance: No

Explanation: Several structures requiring replacement are located in wetlands. The structures are: 16/2, 16/6, 16/7, and 16/11, on the Naselle-Tarlett No. 1, and 2/4, 18/5, and 18/6 on the Naselle-Tarlett No.2. Access to and work around the structures would be accomplished by use of wooden wetland mats. The mats would alleviate the need to place fill material within the wetlands and

protect the underlying vegetation and soils from substantial damage during the replacement activities. The wetland mats would be removed upon completion of the work at each structure location. Additionally any structure replacements within a wetland would include wrapping the pole butt with an impervious membrane designed to keep wood preservative chemicals from leeching into the wetland.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Project activities do not have the potential to impact groundwater or aquifers, including public and private water wells or springs. All spills would be addressed immediately and follow BPA protocol for cleanup and regulatory notifications.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The project locations are confined to the existing transmission line right-of-way corridor and access road easements and would be consistent with that land use. Surrounding land use includes, WA DNR property consisting of forested sections for timber production, USFWS National Wildlife refuge, private agricultural and private timber. The National Wildlife refuge is mostly inaccessible to the public except for a small area around structures 16/10 and 16/11. Structure 16/10 would be replaced as part of the project, and is adjacent to the road leading to a walking path. For safety reasons, the area would be blocked off for 1-2 days during construction activities. During that time, other portions of the refuge would be open for recreationists to use. Structures 4/3 and 4/7 are located on DNR land that is designated as critical habitat for Marbled Murrelets, a listed threatened species. No work outside of the cleared right of way or tree removal would occur during this project. Additionally the habitat along the transmission line corridor in these areas is not consistent with habitat characteristics suitable for the species. The proposed project does not include any other special designated areas.

## 9. Visual Quality

Potential for Significance: No

Explanation: Proposed actions at existing infrastructure would not alter or effect visual quality. Access road improvements are similar to existing access roads and would not be visibly different from the existing conditions.

## 10. Air Quality

Potential for Significance: No

Explanation: The projects are of a short duration and would involve normal construction equipment activities. A small amount of dust and vehicle emissions is expected due to construction.

## 11. Noise

Potential for Significance: No

Explanation: The project is located away from any residential areas on agricultural and forested land. Noise disturbance would be limited to general construction equipment activities, would be for a short duration, and would occur during daylight hours.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The project is considered normal construction and maintenance.

### **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 property owners have been involved throughout the project planning process. Notification via mailed letter has been sent to the current landowner. The letters provide contact information for BPA to allow feedback from landowners/managers concerning the proposed project.

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

Signed: /s/ Greg Tippetts  
Greg Tippetts, EPR-Olympia  
Physical Scientist, Environmental

Date: April 27, 2023