

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: July 3, 2019

REPLY TO
ATTN OF: EP-4

SUBJECT: Categorical Exclusion Determination – 2019 Snohomish District Phase 2 Priority Pole Project

TO: Tina Edwards-TEPL-TPP-1

Attached to this memorandum is BPA's CX Determination for the 2019 Snohomish District Phase 2 Priority Pole Replacement Project. Also included is the CX checklist that supports this determination.

The CX checklist identifies mitigation measures required to help your project meet environmental laws or CX criteria. The EP environmental lead that will help facilitate implementation of mitigation measures required is Chad Browning (cabrowning@bpa.gov or (253) 638-3756).

Please be aware that if project changes are required that involve new locations to be disturbed not analyzed as part of the CX (such as landing pads, relocations, access road widening, tree clearing, new structures, etc.), you need to immediately contact me to determine if additional environmental review is required.

/s/ Chad Browning

Chad A. Browning

Environmental Protection Specialist

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: 2019 Snohomish District Phase 2 Priority Pole Replacement Project

PP&A No.: 4208

Project Manager: Tina Edwards, TEPL-TPP-1

Location: Skagit and Snohomish Counties, WA

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

Description of the Proposed Action: The Bonneville Power Administration (BPA) proposes to replace 17 deteriorating wood poles and associated structural/electrical components (e.g. cross arms, insulators, guy anchors, etc.) along the Murray-Custer No. 1 and Snohomish-Bothell No. 1 230 kV (kilovolts) transmission lines. Replacement would be in-kind and would utilize the existing holes to minimize ground disturbance. If necessary, an auger would be used to remove any loose soil from the existing hole prior to new wood pole placement. New landing construction or access road development is not planned at these locations.

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/ Chad Browning

Chad A. Browning
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel
NEPA Compliance Officer

Date: July 3, 2019

Attachment(s): Environmental Checklist

becc:

J. Sharpe - EP-4

P. Smith - EPR-4

C. Browning – EPR/Covington

H. Adams - LC-7

A. Delacruz - TFN-SNOHOMISH

S. Scott - TFNF-SNOHOMISH

Official File – EP (EQ-15)

CBrowning:cb:206-276-1703:6-21-2019:W:\EP\2019 Files\EQ-13 National Environmental Policy Act (NEPA)\CX\2019 Snohomish Dist. Phase 2 PP\SNOH PP Phase 2 20190620_CX.docx

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: 2019 Snohomish District Phase 2 Priority Pole Replacement Project

Project Site Description

Proposed maintenance activities are confined to the area immediately surrounding 17 structures and completely within the ROW of the Murray-Custer and Snohomish-Bothell transmission lines. The project area encompasses 5 miles within the Murray-Custer transmission line and is located approximately 5 miles north of Arlington, WA and approximately 8.5 miles southeast of Mt. Vernon, WA. For the Snohomish-Bothell transmission line, the project area extends 4 miles from approximately 1.5 miles west of Snohomish, WA to approximately 1.25 miles northeast of Mill Creek, WA. Land use in the surrounding area consists of State-managed, undeveloped rural, and private residential land. Elevation (above mean sea level) within the project area ranges from approximately 5 to 775 feet.

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><u>Explanation:</u> Ethnotech conducted a cultural resource investigation for the project area and submitted a survey report to the Washington Department of Archaeology & Historic Preservation (DAHP), Lummi Nation, Nooksack Indian Tribe, Samish Indian Nation, Sauk-Suiattle Indian Tribe, Stillaguamish Tribe of Indians, and Upper Skagit Indian Tribe on June 4, 2019. BPA received DAHP concurrence on a Determination of No Historic Properties Affected on June 4, 2019. No responses were received from the Tribes.</p> <p>In the event any archaeological material is encountered during project activities, BPA would stop work in the vicinity and immediately notify the BPA environmental lead, archaeologist, and project manager; interested tribes; DAHP; and the appropriate local, State, and Federal agencies. BPA would implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering, and take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.</p>		
2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> The project would require minimal ground-disturbing activities. No prime or unique farmlands would be affected.</p>		
3. Plants (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> No Federal or State special-status plant species are recorded in the project area.</p>		

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



Explanation: Some of the project areas encompass USFWS suitable habitat for Oregon spotted frog. However, BPA crews would not be driving through any flooded roadways, nor would any work occur within standing water or impact surface hydrology. All work would be completed between the July 1 to October 15th timeframe.

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



Explanation: No in-water work is proposed for this project, nor is the project area near any open body of water. Additionally, construction Best Management Practices (BMPs) would be implemented throughout the project to ensure localized soil disturbance does not cause sedimentation issues for any waterway.

6. **Wetlands**



Explanation: Work is planned for the dry season to avoid potential impacts to wetlands. No work would occur in standing water. Should wetland conditions be encountered, BPA crews would utilize wetland matting to avoid impacts.

7. **Groundwater and Aquifers**



Explanation: Groundwater would not be affected by proposed pole replacement activities; no new groundwater wells or use of groundwater proposed.

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



Explanation: No land use changes are proposed; no specially-designated areas have been identified.

9. **Visual Quality**



Explanation: Replacement of wood pole structure would be same location as current wood pole and match existing structures.

10. **Air Quality**



Explanation: Any fugitive dust or similar air quality impacts during project construction are expected to be temporary and minimal.

11. **Noise**



Explanation: Construction noise from typical utility line equipment would be temporary and localized.

12. **Human Health and Safety**



Explanation: Project activities would not impact human health or safety. In fact, the proposed action would help reduce outage times and maintain reliable power in the region.

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, if necessary:

- ☒ Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- ☒ 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, if necessary:

- ☒ 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, if necessary:

Landowner Notification, Involvement, or Coordination

Description: Notification letters would be sent by the BPA Realty Specialist to the affected landowners prior to work.

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

Signed: /s/ Chad Browning
Chad Browning, EPR-COVINGTON
Environmental Scientist

Date: July 3, 2019