

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** FY24 Olympia Priority Poles

**Project No.:** 6797

**Project Manager:** Rusty Ludt, TEPL-TPP-1

**Location:** Clallam, Jefferson, Kitsap, Mason, and Thurston counties, Washington

**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 guy wires at specific locations in BPA's Olympia District. The 14 structures proposed for replacement include Fairmount-Port Angeles #1 25/7, Kitsap-Station X #1 4/15, Olympia-Shelton #1 6/2, Olympia-Shelton #2 7/5 and 18/6, Olympia-South Elma #1 2/8, 5/6, and 7/3, Shelton-Fairmount #2 9/7, 20/4, 24/8, 29/5, 35/1, and 38/9. For all structures, the work would include removing the existing wood pole structures (and guy wires if present) and replacing them with in-kind in the same location. Work areas would be approximately 100 feet by 100 feet at each of the structure replacement locations. Existing access roads would be used to access the work areas and no improvements would be needed.

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 1021.410(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<sup>1</sup>.

*/s/ Jonnel Deacon*

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

*/s/ Katey C. Grange*

Katey C. Grange

NEPA Compliance Officer      Date: April 17, 2025

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

# 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:** FY24 Olympia Priority Pole Replacements

## **Project Site Description**

Structures being replaced are on existing rights-of-way surrounded by forest land. No waterbodies or wetlands would be impacted in project work areas. Land ownership consists of state lands managed by Washington Department of Natural Resources as timber land as well as private timber land.

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

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

Potential for Significance: No

**Explanation:** Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation on November 1, 2024 with the Washington Department of Archaeology and Historic Preservation (DAHP), the Lower Elwha Klallam Tribe, the Confederated Tribes of the Chehalis Reservation, the Jamestown S’Klallam Tribe, the Skokomish Indian Tribe, the Squaxin Island Tribe, the Suquamish Tribe, and the Washington Department of Natural Resources. DAHP concurred with the APE and the determination of no adverse effect on March 31, 2025, and the Suquamish Indian Tribe concurred on March 14, 2025. No other responses were received within 30 days.

In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted 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:** Localized soil disturbance would occur during wood pole replacement. Standard construction erosion control measures would be utilized as necessary to reduce the potential for soils to leave work spaces.

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

Potential for Significance: No

**Explanation:** Minimal disturbance to vegetation is anticipated. There would be no effect to ESA-listed plant species. No impacts to state or federally sensitive species are anticipated. Project activities would be limited to the already impacted access road and transmission line right-of-way and would not substantially alter existing plant communities.

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

Potential for Significance: No

Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise and human presence. The project would have no impacts to state or federally listed sensitive species.

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

Potential for Significance: No

Explanation: The project area is not located within a floodplain and there are no nearby water bodies that support resident, anadromous, or ESA-listed fish. Erosion control best management practices combined with the vegetated distance to the nearest waterbody (approximately 75 feet) would ensure that sedimentation would not enter into any water body.

#### **6. Wetlands**

Potential for Significance: No

Explanation: No wetlands are documented within the project area. No impacts to wetlands are anticipated.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: No use of groundwater proposed. Maximum depth of disturbance would be about 12 feet below ground surface, which would not intersect groundwater.

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

Potential for Significance: No

Explanation: No change in land use would occur. No specially-designated areas are present in the work areas.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Replacement of the wood pole and associated components would be in kind and replaced in the same location; therefore, there would not be a change to the visual quality of the area.

## 10. Air Quality

Potential for Significance: No

Explanation: The project would have a temporary impact on air quality from a small amount of vehicle emissions and dust generated during construction.

## 11. Noise

Potential for Significance: No

Explanation: There would be temporary construction noise. Operational noise of the transmission line would not change.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed action would allow safe and timely access to the transmission line which 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: 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: All activities have been coordinated with land managers and owners.

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

Signed: /s/ Jonnel Deacon  
Jonnel Deacon  
EPR-Olympia

Date: April 17, 2025