**Categorical Exclusion Determination**
Bonneville Power Administration
Department of Energy

**Proposed Action:** Raver-Paul Insulator Replacement Project

**Project No.:** 3393

**Project Manager:** Cynthia Rounds

**Location:** King and Pierce counties, Washington in the BPA Covington District

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

**Description of the Proposed Action:** BPA proposes to replace deteriorating transmission line insulator assemblies and associated hardware at the 32 locations listed in the table below. It has been determined that the existing insulators on these structures do not meet safety and reliability standards. The table also lists 20 locations where insulator replacement activities would require equipment landing improvements prior to mobilizing equipment to the work sites. This work would involve shaping the areas adjacent to the base of the structures and adding imported rock to provide a stable base for large equipment. Additionally, approximately 4.2 miles of access road improvements are required to provide a road surface that is suitable for travel by large transmission line equipment. Access road improvements would involve grading and shaping existing road prisms and placing a layer of surface aggregate. Road surface drainage features, i.e. cross drains, water bars, drain dips, and ditches, would be added or improved where needed. Bulldozers, motor graders, excavators, vibratory drum rollers, and dump trucks would be used for road work activities. Work trucks, a bucket truck, a crane, and a helicopter would be used for insulator replacement activities.

<table>
<thead>
<tr>
<th>Transmission Line ROW</th>
<th>Structure</th>
<th>Landing Improvements</th>
<th>Township</th>
<th>Range</th>
<th>Section</th>
<th>County</th>
<th>Ownership/Land Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raver-Paul No. 1</td>
<td>5/4, 6/1, 6/2, 6/3</td>
<td>None</td>
<td>21N</td>
<td>7E</td>
<td>32</td>
<td>King</td>
<td>Private/Rural Residential</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>17/3, 17/4</td>
<td>17/3, 17/4</td>
<td>19N</td>
<td>6E</td>
<td>14</td>
<td>Pierce</td>
<td>Private/Forestry</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>18/1</td>
<td>18/1</td>
<td>19N</td>
<td>6E</td>
<td>23</td>
<td>Pierce</td>
<td>Private/Forestry</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>18/2, 18/3</td>
<td>18/2</td>
<td>19N</td>
<td>6E</td>
<td>22</td>
<td>Pierce</td>
<td>Private/Forestry</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>27/1, 27/2</td>
<td>27/1, 27/2</td>
<td>18N</td>
<td>5E</td>
<td>10</td>
<td>Pierce</td>
<td>Private/Forestry</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>27/3, 27/4, 27/5</td>
<td>27/3, 27/4, 27/5</td>
<td>18N</td>
<td>5E</td>
<td>9</td>
<td>Pierce</td>
<td>Private/Forestry</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>28/1, 28/2, 28/3</td>
<td>28/1, 28/2</td>
<td>18N</td>
<td>5E</td>
<td>16</td>
<td>Pierce</td>
<td>Private/Forestry and Agriculture</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>28/4, 28/5, 29/1, 29/2, 29/3</td>
<td>28/4, 29/1, 29/2, 29/3</td>
<td>18N</td>
<td>5E</td>
<td>17</td>
<td>Pierce</td>
<td>Private/Rural Residential and Undeveloped</td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>29/4, 30/1, 30/2, 30/3</td>
<td>29/4, 30/1, 30/3</td>
<td>18N</td>
<td>5E</td>
<td>19</td>
<td>Pierce</td>
<td>Private/Rural Residential and...</td>
</tr>
<tr>
<td>Area</td>
<td>Section Numbers</td>
<td>Township</td>
<td>Range</td>
<td>Order</td>
<td>Description</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------</td>
<td>----------</td>
<td>-------</td>
<td>-------</td>
<td>-------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>30/3, 30/4</td>
<td>31/1, 31/2, 31/3</td>
<td>18N</td>
<td>4E</td>
<td>24</td>
<td>Pierce Residential and Undeveloped</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Raver-Paul No. 1</td>
<td>None</td>
<td>18N</td>
<td>4E</td>
<td>23</td>
<td>Pierce Private/Agriculture</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The proposed action would help reduce outage times and maintain reliable power in the region. All work would be in accordance with the National Electrical Safety Code and BPA standards.

**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, July 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.

_Oden Jahn_
Physical Scientist

Concur:

_Sarah T. Biegel_
NEPA Compliance Officer

Date: **July 18, 2016**

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: Raver-Paul Insulator Replacement Project

Project Site Description

Grass and shrub right-of-way surrounded by privately-owned forestry, agricultural, undeveloped, and rural residential properties.

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>□</td>
<td>✔</td>
</tr>
<tr>
<td>Explanation: The Washington Department of Archaeology and Historic Preservation (DAHP) concurred with BPA’s determination of No Adverse Effect to Historic Properties on June 16, 2016. BPA also consulted with the Muckleshoot Indian Tribe, Nisqually Indian Tribe, Puyallup Tribe of Indians, Squaxin Island Tribe, and Suquamish Tribe. The Nisqually Indian Tribe requested notification of any inadvertent discoveries; however, the other tribes did not provide comments on the project. Mitigation: In the event any archaeological material is encountered during project activities, work would stop in the vicinity and the project lead would immediately notify the BPA environmental lead, archaeologist, and project manager; interested tribes; DAHP; and the appropriate local, state, and federal agencies. Implementation of reasonable measures to protect the discovery site would occur, including any appropriate stabilization or covering. Reasonable steps would be taken to ensure the confidentiality of the discovery site, including restricting access.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Geology and Soils</td>
<td>✔</td>
<td>□</td>
</tr>
<tr>
<td>Explanation: The project would require ground-disturbing activities in previously disturbed areas adjacent to existing structures. No prime or unique farmlands would be affected.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Plants (including federal/state special-status species)</td>
<td>✔</td>
<td>□</td>
</tr>
<tr>
<td>Explanation: No federal or state special-status plant species are recorded in the project area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Wildlife (including federal/state special-status species and habitats)</td>
<td>✔</td>
<td>□</td>
</tr>
<tr>
<td>Explanation: No federal or state special-status wildlife species, or habitat, are recorded in the project area.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
5. **Water Bodies, Floodplains, and Fish**
   (including federal/state special-status species and ESUs)

   **Explanation:** Puget Sound Chinook, Puget Sound steelhead, bull trout and/or their critical habitats are found in South Prairie Creek, less than 0.25-mile from Structures 18/1 and 18/2; in Page Creek, approximately 100 feet from Structure 18/1; and in the Puyallup River, approximately 500 feet from Structure 29/3 and less than 0.25-mile from Structure 29/4. No in-water work is proposed for this project. Due to the slope and vegetation conditions at these locations and the small amount of soil disturbance, project activities would not lead to erosion and sedimentation issues to these rivers. Additionally, construction Best Management Practices (BMPs) would be implemented throughout the project to ensure localized soil disturbance does not cause sedimentation issues to any waterway. For the above reasons, it was determined that the proposed work would have “No Effect” on Puget Sound Chinook, Puget Sound steelhead, bull trout, or these species’ critical habitat, and “Would Not Adversely Affect” Essential Fish Habitat.

6. **Wetlands**

   **Explanation:** The existing access roads between 27/4 and 27/5, and between 31/3 and 31/4, cross small wetland swales. The addition of crushed rock is needed to allow full-year access. The width of the fill would be limited to the minimum necessary, approximately 12 feet, and the area of fill is under 0.10 acre at each individual site. Work would take place under Nationwide Permit (NWP) 12 with no pre-construction notification required. NWP 12, General, Regional, and Water Quality conditions would apply. Mitigation: Would use temporary matting in the vicinity of 28/3 and 28/4, and other areas as necessary, during construction if the ground is too saturated to support transmission line equipment. Would not allow petroleum products, sediment, or other deleterious materials to enter any wetlands. Would ensure spill containment and cleanup materials are readily available at the project site, staging areas, and in construction vehicles.

7. **Groundwater and Aquifers**

   **Explanation:** The proposed work is not anticipated to impact groundwater.

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

   **Explanation:** No change in land use and no specially designated areas identified.

9. **Visual Quality**

   **Explanation:** New insulator assemblies would not significantly change the appearance of the structures.

10. **Air Quality**

    **Explanation:** Any fugitive dust or similar during project implementation is expected to be temporary and minimal.

11. **Noise**

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

12. **Human Health and Safety**

    **Explanation:** Project activities would not impact human health or safety.
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 all landowners prior to beginning work.

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

Signed: Oden Jahn – EPR-4

Date: July 18, 2016

Physical Scientist