Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

**Proposed Action:** Custer-Ingledow Impairments 5/3 to 5/4 and 9/5 to 9/6

**PP&A No.:** 3885

**Project Manager:** Natasha Gentry – TELC-TPP-1

**Location:** Whatcom County, Washington

<table>
<thead>
<tr>
<th>Transmission Line/ROW</th>
<th>Structure #</th>
<th>Township</th>
<th>Range</th>
<th>Section</th>
<th>Ownership/Land Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Custer-Ingledow No. 1 and No. 2</td>
<td>5/3 to 5/4</td>
<td>40N</td>
<td>1E</td>
<td>15</td>
<td>Private/Rural Residential</td>
</tr>
<tr>
<td>Custer-Ingledow No. 1</td>
<td>9/5 to 9/6</td>
<td>41N</td>
<td>1E</td>
<td>32</td>
<td>Private/Rural Residential</td>
</tr>
</tbody>
</table>

**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) proposes to address two line impairments on the Custer-Ingledow No. 1 and No. 2 lines. An impairment is an area where the distance from the conductor to the ground surface is inadequate, per National Electrical Safety Code (NESC) standards, resulting in a threat to line reliability and posing a risk to public health and safety. The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line, to maintain power delivery in the region, and to ensure the line meets current NESC and Federal Energy Regulatory Commission (FERC) standards.

The proposed project includes the following proposed work: Removal and redistribution of soil and/or rock at two locations under the existing transmission lines using mechanical removal. Approximate volume of removal is estimated at 1,750 cubic yards, and a total of approximately 68,545 square feet would be disturbed as a result of the removal and redistribution.

The majority of the proposed work would occur within the existing, vegetated right-of-way corridor on mostly flat terrain with mostly grassy and shrubby vegetation. A small amount of soil at the mile 5 impairment would be relocated directly adjacent to the right of way, per the request of the landowner. The impairment sites would be accessed using the existing BPA access roads, though equipment and personnel may be required to traverse off-road to access the proposed sites. Both impairments are on privately-owned land within the BPA right-of-way (ROW). Equipment used to perform this work may include a combination of the following: blasting material and equipment including noise-reducing blast mats, dump trucks, bulldozers, backhoes, excavators, and work trucks. After the impairments have been removed, all areas of bare soil would be covered with a natural fiber erosion control fabric such as jute or coir matting to provide site stabilization. In addition, all exposed soils would be hydroseeded using a Western Washington native seed mix appropriate for the region.
based on recommendations from either the Stormwater Management Manual for Western Washington or as directed by the landowner.

**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.

/s/ Emma Reinemann  
Emma Reinemann  
Physical Scientist (Environmental)

Concur:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer  
Date: June 19, 2018

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: Custer-Ingledow Impairment Removal at 5/3 to 5/4 and 9/5 to 9/6

Project Site Description

The proposed project will be conducted from structures 5/3 to 5/4 and 9/5 to 9/6 of the Custer-Ingledow No. 1 and No. 2 lines. Both impairments are located within BPA easement on privately-owned land and the surrounding land use is rural residential. Vegetation at the impairments is grassy with some shrubs.

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>
</tbody>
</table>

**Explanation:** The project area was surveyed by a BPA archaeologist and reviewed by Washington Department of Archaeology and Historic Preservation (DAHP). No cultural resources were identified during the survey. DAHP concurred with BPA’s no adverse effect to historic properties determination on May 8, 2018.

In the event any archaeological material is encountered during project activities, 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. Implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering. Take reasonable steps to ensure the confidentiality of the discovery site, including restricting access.

| 2. Geology and Soils | ☑ | ☐ |

**Explanation:** The project includes removal of soil and/or rock under the transmission lines in two discrete areas identified as impairment sites for a total of 1,750 CY of removal of soil and rock. The soil is proposed to be dispersed on site and directly adjacent to the right of way. BMPs would be used to prevent erosion and disturbed areas would be reseeded.

| 3. Plants (including federal/state special-status species) | ☑ | ☐ |

**Explanation:** No known federal/special-status species are present in the project area. Vegetation removal would be limited to the area directly affected by the project. Any disturbed areas would be reseeded with an appropriate seed mix.

| 4. Wildlife (including federal/state special-status species and habitats) | ☑ | ☐ |

**Explanation:** The project area does not include habitat for any special-status species. There would be no effect to ESA-listed species in the area.
5. **Water Bodies, Floodplains, and Fish**  
   (including federal/state special-status species and ESUs)  
   ![Checkbox]  
   ![Checkbox]

   **Explanation:** No in-water work is proposed for this project. Due to the area of disturbance, a stormwater pollution prevention plan (SWPPP) would be prepared according to the Stormwater Management Manual for Western Washington for this project.

6. **Wetlands**  
   ![Checkbox]  
   ![Checkbox]

   **Explanation:** A wetland is present south of the access road to the mile 5 impairment. Erosion and sediment control measures would be implemented to ensure that off-site sedimentation does not occur. Project activities would not impact the wetland.

7. **Groundwater and Aquifers**  
   ![Checkbox]  
   ![Checkbox]

   **Explanation:** Spill prevention measures will be utilized during construction activities. The project would not provide a pathway for groundwater contamination.

8. **Land Use and Specially Designated Areas**  
   ![Checkbox]  
   ![Checkbox]

   **Explanation:** No change in land use would occur and project activities would not impact land use. No specially designated areas were identified within the project limits.

9. **Visual Quality**  
   ![Checkbox]  
   ![Checkbox]

   **Explanation:** There would be no change to the visual quality of the area as a result of the proposed activities.

10. **Air Quality**  
    ![Checkbox]  
    ![Checkbox]

    **Explanation:** The project would have no significant impacts on air quality; however, a small amount of vehicle emissions and dust may occur during construction.

11. **Noise**  
    ![Checkbox]  
    ![Checkbox]

    **Explanation:** Some temporary construction noise would occur during daylight hours. The operational noise of the transmission line would not change.

12. **Human Health and Safety**  
    ![Checkbox]  
    ![Checkbox]

    **Explanation:** During project activity, all standard safety protocols would be followed. The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line and to maintain power delivery in the region.

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**Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- ![Checkbox] 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:** NA

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

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.

Landowner Notification, Involvement, or Coordination

Description: All activities would be coordinated with 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: /s/ Emma Reinemann

Emma Reinemann
Physical Scientist (Environmental)