Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

**Proposed Action:** Olympia-Grand Coulee No. 1 Transmission Line Insulator Replacement Project, Phase III Miles 70 to 100

**PP&A No.:** 4228

**Project Manager:** Michael Wellner – TEPL-TPP-1

**Location:** King and Kittitas counties, Washington

**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) is proposing to replace insulators, improve/reconstruct access roads, and install fall protection along the Olympia-Grand Coulee No. 1 transmission line together between miles 70 and 100. The proposed project, the third phase of a total of four phases of proposed work along the transmission line, would occur within King and Kittitas, counties, Washington. The project would cross through the Mt Baker/Snoqualmie National Forest, Okanagan/Wenatchee National Forest, Tacoma Watershed (Washington Department of State Lands), and private lands.

BPA proposes to replace insulators (strings of bell shaped ceramic discs that connect the conductor to the transmission line towers) from miles 70 to 100. This work would be performed using a line truck and/or helicopter; linemen would access transmission towers and change out insulators. In steep, rough terrain, helicopters are often necessary to assist in transporting the old and new insulators to and from linemen positioned at conductor level on the transmission towers. The proposed project would require multiple staging areas and/or landing zones staggered along the proposed project area to accommodate the work.

In order to provide a safe work environment for this project, BPA is proposing to improve and repair approximately 2.1 miles of access roads. Proposed road work would include blading, shaping, grading, brushing, and placing surface rock on new and existing road prisms, reconstructing 2 fords, installing and replacing 13 cross-culverts, and constructing 18 drain dips. In addition to the proposed road improvements, work would include the installation of three leveled landing areas, which would measure 20 x 25 feet (ft.), 30 x 60 ft., and 40 x 60 ft. General equipment used for this type of landing work includes: graders, rollers, bull-dozers, brush hogs, excavators, and dump trucks.

Additionally, BPA would install fall protection—the MSA Latchways system—on the vertical climbing path of each transmission tower. The cable safety system would be connected to the tower with a series of brackets approximately every 10 feet and a top and bottom anchor. Once installed, workers would use the system when climbing the tower by attaching their harness to a specialized pulley which allows them to glide along the safety cable as they climb. Installation would require a line truck and two-to-three workers in the tower and one-to-two workers on the ground.

Because of the project area’s elevation and winter weather conditions, construction is scheduled to begin in June of 2020 and finish in October of 2020.
**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.

Laura Roberts
Biological Scientist

Concur:

/s/ Katey Grange            Date:  February 13, 2020
Katey Grange
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: Olympia-Grand Coulee No. 1 Transmission Line Insulator Replacement Project, Phase III Miles 70 to 100

Project Site Description

The project located in central Washington consists predominantly of logged and second growth upland forest. See Table below, for Township, Range, Section Number, County, and Ownership information.

<table>
<thead>
<tr>
<th>Township, Range, Section</th>
<th>County, State</th>
<th>Ownership/Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>20N, 9E, Section 9-13</td>
<td>King, WA</td>
<td>Private</td>
</tr>
<tr>
<td>20N, 10E, Section 13,17,18,20-24</td>
<td>King, WA</td>
<td>Private</td>
</tr>
<tr>
<td>20N, 11E, Section 2-4,8,9,17,18</td>
<td>King, WA</td>
<td>Private, USFS</td>
</tr>
<tr>
<td>20N, 13E, Section 4,5,9,10,13-15,24</td>
<td>Kittitas, WA</td>
<td>Private, USFS, WA Dept. State Lands</td>
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<tr>
<td>20N, 14E, Section 19,29,30</td>
<td>Kittitas, WA</td>
<td>Private, WA Dept. State Lands</td>
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<tr>
<td>21N, 11E, Section 35,36</td>
<td>King, WA</td>
<td>USFS</td>
</tr>
<tr>
<td>21N, 12E, Section 26,27,34-36</td>
<td>Kittitas, WA</td>
<td>Private, USFS</td>
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<tr>
<td>21N, 13E, Section 31</td>
<td>Kittitas, WA</td>
<td>USFS</td>
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</tbody>
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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>
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<tr>
<td>Explanation: Following a review of the potential project impacts to cultural resources, BPA has determined that this undertaking would have No Adverse Effect to historic properties. BPA conducted cultural resource field surveys for the proposed project. BPA sent a Letter of Determination of No Adverse Effect with the stipulation of archaeological monitoring and site avoidance to the Washington SHPO in late May 2018. Concurrently, determination letters were sent to the Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Tribe, the Puyallup Tribe, the Tulalip Tribe, the Nisqually Indian Tribes, Mt. Baker-Snoqualmie National Forest, Okanogan-Wenatchee National Forest, and the Washington Department of Natural Resources. BPA received one response consisting of SHPO concurrence on April 2, 2018. Note: The following minimization measures would be implemented.</td>
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<tr>
<td>• Any necessary additional work sites such as landing zones and staging areas outside of previously-consulted upon areas would obtain Section 106 Concurrence prior to use.</td>
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<tr>
<td>• The proposed project would implement site avoid measures as stipulated in the letter of determination.</td>
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<tr>
<td>2. Geology and Soils</td>
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<td>Explanation: Minimal new disturbance is anticipated. Predominantly, ground disturbing activities would occur on existing access roads and the new landing areas. These areas would be stabilized with</td>
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</table>
rocking after ground disturbance.

**Note:** The following minimization measures would be implemented.

- During construction all appropriate Best Management Practices (BMP) would be used to implement site specific erosion and sediment control. All disturbed areas would be stabilized and seeded.

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

**Explanation:** Minimal disturbance to vegetation is anticipated. Vegetation may be crushed in those locations where equipment would be accessing structures and would be removed in the new landing areas. There would be no effect to ESA-listed plant species. No impacts to state sensitive plant species or Forest Service sensitive plant species are anticipated.

In order to limit the spread of invasive terrestrial plants and minimize fire danger on National Forest System lands managed by Mt Baker/Snoqualmie National Forest and Okanagan/Wenatchee National Forest, BPA would comply with the *Standard Operating Procedures for limiting the spread of invasive species and fire prevention as directed in the Federal Land Policy and Management Act (FLPMA)*.

**Note:** The following minimization measures would be implemented to minimize vegetation impacts.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal
- Stabilize and seeded with a geographic and climate-appropriate seed mix approved by the landowner
- Utilize erosion and sediment control materials composed of certified weed free materials

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

**Explanation:** In general, the project would have temporary noise and disturbance impacts to wildlife and habitat related to elevated helicopter and equipment noise and human presence. No impacts to state sensitive species or Forest Service sensitive species are anticipated.

The project would have no effect to ESA-listed species with the exception of marbled murrelet and Northern spotted owl. Several areas of the project occur adjacent to marbled murrelet potential populations and high probability nesting habitat, as well as, within Northern spotted owl designated critical habitat, near historic owl nesting sites, and high probability owl nesting habitat. As the scheduled work would occur during both species nesting season, it has the potential to impact marbled murrelet and northern spotted owl. On September 16, 2019, BPA submitted a Biological Assessment for Marbled Murrelet and Northern Spotted Owl, Olympia-Grand Coulee Access Road Work and Insulator Replacement Miles 70-100, King and Kittitas Counties, Washington, FY 2020 to USFWS The resultant Biological Opinion *Olympia-Grand Coulee No. 1 Transmission Line Maintenance Project located in King and Kittitas Counties, Washington - 01EWFW00-2019-F-1618*, dated February 12, 2020, determined the project may affect, not likely to adversely affect noradnial spotted owl and not likely to jeopardize the continued existence of the marbled murrelet marbled murrelet.

**Note:** The following minimization measures would be implemented to minimize impacts to wildlife and their habitat.

- Drive on existing access roads
- Reduce work area footprint to the least necessary to safely do the work
- Crush vegetation in place of removal
- Stabilize and seeded with a geographic and climate-appropriate seed mix approved by the landowner
- In accordance with the Biological Opinion, *Olympia-Grand Coulee No. 1 Transmission Line Maintenance Project located in King and Kittitas Counties, Washington - 01EWFW00-2019-F-1618*, all measures would be followed.
5. **Water Bodies, Floodplains, and Fish**
   (including Federal/state special-status species, ESUs, and habitats)

   **Explanation:** BPA proposes to reconstruct two fords, one in Sunday Creek and the other in an unnamed drainage/tributary to Sunday Creek. Sunday Creek is not occupied by salmon or steelhead (ESA listed species and non-ESA listed species), but is characterized as critical habitat for Puget Sound (PS) Chinook and PS steelhead. The action area is also Essential Fish Habitat for Chinook and coho.

   BPA submitted an action notification under its *Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho*. BPA received concurrence on November 12, 2019 from Branch Chief - Central/South Puget Sound, NOAA, Fisheries, stating that "The proposed action falls under the category ‘access road maintenance’ for which the effects from such actions were characterized and incidental take authorized under NMFS biological opinion WCR-2014-1600. By review of the provided information NMFS has confirmed the proposed action is consistent with SLOPES WCR-2014-1600".

   Because work would occur within Waters of the US (Sunday Creek), BPA is scheduled to submit Nationwide Permit No. 12, Preconstruction Notification in mid-February 2020. US Army Corps of Engineers authorization would be obtained prior to conducting any in-stream work.

   The proposed project may have minimal and temporary impacts to ephemeral drainages during culvert installation. Due to the limited ground disturbance and use of BMPs, sediment from ground disturbance work other than the culvert installations is not anticipated to enter waterways.

   **Note:** The following minimization measures would be implemented to prevent sediment or contaminants from reaching any waterbodies.

   - Erosion control measures would be implemented to prevent sedimentation from reaching any nearby waterbody.
   - Appropriately stocked spill response kits would be located on vehicles, other equipment, and storage yards used on this project.
   - All Nationwide Permit requirements would be implemented during construction.

6. **Wetlands**

   **Explanation:** No ground disturbing activities are anticipated in wetlands. Erosion control measures would be implemented to prevent sedimentation.

7. **Groundwater and Aquifers**

   **Explanation:** No impacts to ground water or aquifers are anticipated due to the relatively deep level of ground water within the project area.

   **Note:** The following minimization measures would be implemented to minimize groundwater contamination potential.

   - Appropriately stocked spill response kits would be located on vehicles, other equipment, storage areas, and landing zones used on this project.

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

   **Explanation:** No change in land use would occur and project activities would not impact existing land uses.

   For those portions of the project crossing the Mt Baker/Snoqualmie National Forest Okanagan/Wenatchee National Forest the *Memorandum of Understanding between the Bonneville Power Administration United States Department of Energy and the United States Forest Service United States Department of Agriculture Regarding Transmission Facilities and Access to Those Facilities on National Forest System Lands Standard Operation Procedures* listed below would be implemented:
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<tr>
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<th>Visual Quality</th>
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<tbody>
<tr>
<td><strong>Explanation:</strong></td>
<td>The project would have a minimal impact to visual quality. Existing insulators would be changed with the same or visually similar insulators, which is consistent with other insulators along the transmission line.</td>
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<thead>
<tr>
<th></th>
<th>Air Quality</th>
<th>![Checkmark]</th>
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<tr>
<td><strong>Explanation:</strong></td>
<td>A small amount of vehicle emissions and dust may occur temporarily during construction.</td>
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<table>
<thead>
<tr>
<th></th>
<th>Noise</th>
<th>![Checkmark]</th>
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<tr>
<td><strong>Explanation:</strong></td>
<td>Some temporary construction noise from construction activities and helicopter use would occur during daylight hours. The operational noise of the transmission line would not change.</td>
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<thead>
<tr>
<th></th>
<th>Human Health and Safety</th>
<th>![Checkmark]</th>
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<tbody>
<tr>
<td><strong>Explanation:</strong></td>
<td>No impacts to human, health, and safety are anticipated.</td>
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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:

- 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: BPA realty, environmental and cultural resource specialist have coordinated the proposed project activities with Mt Baker/Snoqualmie National Forest, Okanagan/Wenatchee National Forest, Department of State Lands, and private landowners.
Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: Laura Roberts EPI-4  Date: February 13, 2020
Biological Scientist