Proposed Action: Addy-Cusick No. 1 Corridor Heli-saw Tree Pruning Project

PP&A No.: 4495

Project Manager: Craig Fackrell

Location: Pend Oreille and Stevens counties, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.3 Routine Maintenance, B3.2 Aviation Activities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to prune ("side-limb") trees along approximately 23 miles of the 230-kilovolt Addy-Cusick No. 1 transmission line corridor using a helicopter-slung saw ("heli-saw"). Pruning is done with a Type III helicopter equipped with a 50-foot support pole carrying a 22-foot long vertical bank of eight saws below the helicopter. Four to seven helicopter service/fueling landings would be located throughout the project area and would utilize existing suitable locations. Tree branches and small woody debris would fall to the ground and be left to naturally decompose. In addition to the helicopter flight crew, ground-based safety spotters would be used to ensure public safety and remove debris from roads. No work would occur within 50 feet of high-traffic roads. Ground crews would access the project area using the existing access road network with pickup trucks and hike in on foot where needed. The work is expected to take place over the course of three to six days in April 2022, if roads are sufficiently clear of snow, or in late summer/early fall 2022.

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/ Oden Jahn
Oden W. Jahn
Natural Resource Specialist

Concur:

/s/ Sarah Biegel
Sarah T. Biegel           Date: December 6, 2021
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:** Addy-Cusick No. 1 Corridor Heli-saw Tree Pruning Project

**Project Site Description**

The project area is along the BPA Addy-Cusick No. 1 transmission line corridor from structure 4/1 to structure 26/11, near the BPA Cusick Substation. The corridor is located in the southwest Selkirk Mountains between Addy, Washington and the Selkirk foothills east of Cusick, Washington. The corridor is predominantly a shrub-covered right-of-way (ROW) with adjacent sparsely- to heavily-forested lands. Project activities would take place along rural residential, agricultural, private forestry, and United States Forest Service – Colville National Forest lands.

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**
   
   Potential for Significance: No
   
   **Explanation:** The proposed actions were found to have no potential to cause effects to historic properties, consistent with 36 CFR 800.3(a)(1).

2. **Geology and Soils**
   
   Potential for Significance: No
   
   **Explanation:** Project activities are not expected to result in soil disturbances.

3. **Plants (including Federal/state special-status species and habitats)**
   
   Potential for Significance: No with Conditions
   
   **Explanation:** Project activities are not expected to result in vegetation disturbances beyond the extent of the trees’ canopy. Whitebark pines are proposed for listing under the Endangered Species Act (ESA) and are known to occur in the Selkirk mountain range, typically at altitudes of 5,300 feet or greater. The proposed project does not extend into these altitudes; thus, it is unlikely that whitebark pine would be impacted by project activities. BPA determined that the proposed action may affect, but is not likely to jeopardize the continued existence of whitebark pine. The US Fish and Wildlife Service concurred with this determination in a letter dated May 4, 2021.

   **Notes:** The Project Manager would be responsible for ensuring that vehicles and equipment are cleaned prior to mobilizing to the project area, and as needed during the performance of the work, to reduce the spread of invasive species.

4. **Wildlife (including Federal/state special-status species and habitats)**
   
   Potential for Significance: No with Conditions
Explanation: Grizzly bear, Canada lynx, and monarch butterfly are potentially present in the project area. Project activities may temporarily disturb individual grizzly bears and Canada lynx, if present in the project area at the time of these activities. Therefore, BPA determined that the proposed project may affect, but is not likely to adversely affect grizzly bears and Canada lynx. BPA also determined that the proposed action may affect, but is not likely to jeopardize the continued existence of monarch butterfly (candidate for ESA listing). The US Fish and Wildlife Service concurred with these determinations in a letter dated May 4, 2021. Additionally, non-sensitive bird species may utilize the trees adjacent to the ROW corridor for nesting and rearing, until the young have fledged.

Notes: The Project Manager would be responsible for implementing several conservation measures during this project:

- Work would be conducted between August 1 and April 14 to minimize the potential for disrupting nesting birds.
- BPA personnel and contractors would comply with food/attractant storage requirements included in Colville National Forest Order 06-21-00-19-02 to avoid attracting grizzly bears and to minimize human-bear interactions.
- BPA personnel and contractors would not engage in overnight camping on calendar days that project-related work is performed to minimize potential interactions with grizzly bears.
- BPA personnel and contractors performing project-related work away from their vehicles would carry bear spray and be trained how to properly use bear spray to deter attacking wildlife.
- BPA personnel and contractors would be encouraged to report sightings of grizzly bears, Canada lynx, and monarch butterflies observed during project-related work to the EP Environmental Lead.

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

Potential for Significance: No with Conditions

Explanation: Water bodies have been noted in the project summary that would be provided to the contractor performing the heli-saw work. Project activities are not expected to impair the physical or biological functions of fish-bearing or non-fish-bearing water bodies or floodplains in the project area.

Notes: The Project Manager would be responsible for ensuring that helicopter re-fueling operations are located at least 150 feet from the nearest wetland or water body, and that there is at least one spill kit readily available on site prior to any refueling operations. Spill kits would be stocked and sized appropriately to respond to the types of spills that could occur. The Project Manager would be responsible for ensuring that work crews utilize pumps, funnels, sorbents, or other spill prevention methods when dispensing or transferring fuel to mitigate the inadvertent release of fuel onto the ground during re-fueling.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: Wetlands have been noted in the project summary that would be provided to the contractor performing the heli-saw work. Project activities are not expected to impair the physical or biological functions of wetlands in the project area.

Notes: The Project Manager would be responsible for ensuring that helicopter fueling and landing areas are located at least 150 feet from the nearest wetland.
7. **Groundwater and Aquifers**

Potential for Significance: No

**Explanation:** Project activities are not expected to impact groundwater or aquifers.

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

Potential for Significance: No

**Explanation:** Land use would remain the same. Project actions are consistent with vegetation management objectives and agreements with underlying landowners which promote safe and reliable energy transmission.

9. **Visual Quality**

Potential for Significance: No

**Explanation:** Project actions would occur along the existing cleared ROW and would not significantly alter the appearance of the ROW.

10. **Air Quality**

Potential for Significance: No

**Explanation:** Some dust would occur with helicopter operations. Dust creation would be isolated to small areas and in short duration. Exhaust from equipment may temporarily reduce air quality in the immediate project area.

11. **Noise**

Potential for Significance: No

**Explanation:** Project would have noise associated with the small helicopter and saw apparatus. During project activities, work would take place during daylight hours, for approximately eight hours per day. The project would be relatively short in duration – three to six days.

12. **Human Health and Safety**

Potential for Significance: No with Conditions

**Explanation:** The proposed work is necessary to ensure ongoing safe and reliable operation of the transmission line and to maintain power delivery in the region. Potential human health and safety risks would be minimized by implementing the measures below.

**Notes:** The Project Manager would ensure that the heli-saw contractor develops and implements a site-specific health and safety plan to address any hazards during the proposed work. Daily safety briefings would be held prior to work being conducted, with detailed accident response plans being discussed in the advent of an unforeseen emergency. Aviation operations would be conducted per all published regulations. Ground crews would be in direct communication with helicopter crews during tree trimming operations, and would ensure the area is clear of the general public prior to trimming trees within the project area.

**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.

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**Landowner Notification, Involvement, or Coordination**

**Description:** BPA Project Manager would ensure that land owner notification letters containing a general project description and the Project Manager’s contact information are sent to all adjacent property owners several weeks prior to the project beginning. The Project Manager would address any access issues or general questions that could arise as a result of those letters. BPA notified the Colville National Forest of the Addy-Cusick No. 1 Corridor Heli-saw Tree Pruning Project in mid-June 2021, requesting review and comments. No comments were received during the agreed-upon 120-day review period. Additionally, the BPA Project Manager and Colville National Forest staff would be in contact during operations to notify the general public prior to and during operation days.
Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed:  /s/ Oden Jahn  Date:  December 6, 2021
Natural Resource Specialist – EPI-4