DATE: August 10, 2015

REPLY TO ATTN OF: KEPR-Bell-1

SUBJECT: FY15 Danger Pole Environmental Review – Libby-Bonners Ferry Transmission Line

TO: Gary Beck  
Project Manager - TEP-TPP-1

Attached to this memorandum is BPA’s CX Determination for the FY15 Wood Pole Replacements along the Libby-Bonners Ferry Transmission Line located in the Spokane and Kalispell Districts. Also included is the CX checklist that supports this determination.

The CX checklist may identify mitigation measures required to help your project meet environmental laws or CX criteria. The KEP environmental lead who will help facilitate implementation of mitigation measures required is Michael A. Rosales.

Please be aware that if project changes are required that involve new locations to be disturbed not analyzed as part of the CX (such as landing pads, relocations, access road widening, tree clearing, new structures, etc.), you need to immediately contact me at 509-994-9239 to determine if additional environmental review is required.

/s/ Philip Smith for  
Michael A. Rosales  
Physical Scientist - Environment
Proposed Action: FY15 Wood Pole Replacements along the Libby-Bonners Ferry Transmission Line

Project No. (if applicable): 

Project Manager: Gary Beck

Location: Lincoln County, Montana and Boundary County, Idaho. See wood pole location attachment for structure locations.

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 wood poles and associated structural/electrical components (e.g. cross arms, insulators, guy anchors, etc.) along the Libby-Bonners Ferry 115 kilovolt Transmission Line. Replacement will be in kind and will utilize the existing holes to minimize ground disturbance. If necessary, an auger or backhoe will be used to remove any loose soil from the existing hole prior to new wood pole placement. A total of 24 poles will be replaced along about 54 miles of line. (See attachment.)

Access road maintenance will be limited to mowing, blading, compacting, shaping, and surfacing existing access road segments that require maintenance to access the wood pole locations. Reconstruction of existing water bars, fords, culverts, and drainage ditches may also occur. All access road maintenance will be limited to the existing road cut and prism.

The proposed action will allow safe and timely access to the transmission lines which will help reduce outage times and maintain reliable power in the region. All work will 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.

/s/ Philip Smith for  
Michael A. Rosales  
Physical Scientist - Environment

Concur:

/s/ Katherine S. Pierce  
Katherine S. Pierce  
NEPA Compliance Officer

Date: August 10, 2015

Attachment(s):
Environmental Checklist  
Wood Pole Location
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:** FY15 Wood Pole Replacements along the Libby-Bonners Ferry Transmission Line

### Project Site Description

Scheduled transmission line maintenance will occur along the Libby-Bonners Ferry Transmission Line located in Lincoln County, Montana and Boundary County, Idaho. All wood pole replacements and minor access road work are located within the existing transmission line right of way (ROW), in rural, non-developed areas and/or in rural, agricultural areas along the transmission line. The transmission line is located in the Spokane and Kalispell Districts.

### Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource</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:**
- A cultural survey was performed at all FY15 wood pole replacement locations, associated landings and proposed road improvement locations. Report findings indicated that the Libby-Bonners Ferry Transmission Line is eligible for the National Register for Historic Places. No additional historic or cultural resources were identified during the pedestrian survey of the Area of Potential Effect.
- Concurrence letters to Montana and Idaho SHPO’s, affected Tribes and USFS were mailed out on August 5, 2015 requesting concurrence on BPA’s determination of No Adverse Effect.
- The proposed action is considered routine transmission line and access road maintenance necessary to preserve the existing infrastructure, maintain roadway safety, and manage storm water run-off.
- Replacement wood poles will be placed in the existing locations. Existing landings will be improved if necessary. Road work will be limited to maintenance on existing access road cut and prism and structure footprints in the cleared transmission line right of way.
- Crews and equipment will use existing access roads to and from each work site.
- In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area will be secured and the SHPO and the environmental project lead must be notified.

| 2. Geology and Soils | ✓                            | ❌                                            |

**Explanation:** Material and equipment staging areas will be located on existing roads, structure landings and turnarounds. Equipment is to be restricted to existing road prisms, road fills and structure landings. Standard construction erosion control measures will be utilized as necessary.

| 3. Plants (including federal/state special-status species) | ✓                            | ❌                                            |

**Explanation:** No federal/special status plants present within the project area. Disturbed areas will be reseeded as necessary.
4. **Wildlife** (including federal/state special-status species and habitats)

   **Explanation:** Listed animal species may be present within ½ mile of the transmission line. Project activities are not expected to alter or affect habitat conditions for their respective prey species or affect existing habitat and/or distribution. With respect to potential habitat conditions and possible future occupancy of the project area by listed animal species, the proposed project is not expected to result in conditions that would preclude use by any listed animal species; therefore, this project will have a “No Effect” on listed animal species and habitat.

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

   **Explanation:** Listed fish species may inhabit streams that are within ½ mile of the transmission line. Project activities are not planned near water resources containing listed fish species therefore there will be “No Effect” to listed fish species and critical/essential fish habitat.

6. **Wetlands**

   **Explanation:** Mapped wetlands are present along the transmission line at structure locations 47/6, 47/7 and 47/8. These structures will be accessed once ground is dry or with the installation of wetland matting.

7. **Groundwater and Aquifers**

   **Explanation:** Spill prevention measures will be utilized during construction activities. Project will not result in any ground water withdrawals nor provide a pathway for groundwater contamination.

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

   **Explanation:** No change in land use will occur. Sections of the transmission line, from mile 19 to mile 48, are situated in the Kootenai National Forest and within Forest Service designated grizzly bear management/recovery areas. TLM will coordinate with the appropriate Ranger District to ensure Forest Service access requirements into the grizzly bear management/recovery units are followed.

9. **Visual Quality**

   **Explanation:** No change in visual quality as wood poles and associated components will be replaced in kind and replaced in the same location. All work will be performed within existing transmission line right of way.

10. **Air Quality**

    **Explanation:** Any dust from construction activity is expected to be temporary.

11. **Noise**

    **Explanation:** Temporary construction noise during daylight hours. Operational noise of transmission line would not change.

12. **Human Health and Safety**

    **Explanation:** The proposed action will allow safe and timely access to the transmission line which will help reduce outage times and maintain reliable power 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:

- 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:

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**Landowner Notification, Involvement, or Coordination**

Description: BPA Realty will make the necessary landowner notifications.

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

Signed: /s/ Philip Smith for  
Michael A. Rosales, KEPR-Bell-1  
Physical Scientist - Environment  
Date: August 10, 2015