**Proposed Action:** McCullough Tap and Franz Holmes Tap ground project

**PP&A No.:** 3310

**Project Manager:** Scott Nosal, TELC-TPP-3

**Location:** Pierce County, Washington

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

**Description of the Proposed Action:** BPA proposes to install grounding rods adjacent to structure 2/15 on the McCullough Tap line, and structure 1/1 of the Franz Holmes Tap line. The project would involve driving a grounding rod vertically roughly 40 to 80 feet below the ground surface, as the soil permits, next to the structure, then a copper conductor would be installed horizontally from the ground rod to the pole with a small trench 3 feet deep by 1 foot wide. The rods would be installed 5 to 15 feet away from the structure on the side opposite of the street.

**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/ Aaron Shurtliff  
Aaron Shurtliff  
Environmental Engineer

Concur:

/s/ Stacy L. Mason  
Date: December 15, 2015  
Stacy L. Mason  
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: McCullough Tap and Franz Holmes Tap ground project

Project Site Description

The project is located within the ROW in an urban area adjacent to a road.

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>
<tr>
<td>Explanation: Project was reviewed by BPA archaeologist, Jessica Hennessey with the following observations: The Franz Holmes tap project location was previously surveyed in 2013 and no resources were identified. The McCullough Tap project location is in previously disturbed urbanized environment with no potential for surface archaeology due to the heavy disturbances and also, knowing that there are sub-surface utilities present in addition to the nature of the disturbance caused by modern road construction, there will be no intact native soils present above 30-60 cmbs. Two archaeological reports for some surveys that were carried out nearby confirmed that this is part of the Puget trough area, namely glacial till (sands and gravel) begins around 30cmbs. Shovel test probes were excavated as part of these two surveys and they confirmed on the ground that this is the case. Consequently, there is no potential for the existence of sub-surface cultural remains below 30 cmbs. The potential for the existence of intact cultural remains in this area is practically zero and therefore, the potential for this undertaking to impact cultural resources is eliminated and there is no need to consult.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Geology and Soils</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Explanation: Project area is in previously disturbed urban area and will be restored to existing conditions after construction</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 listed plants in project area</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4. **Wildlife** (including federal/state special-status species and habitats)

   Explanation: No listed animal species in project area

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

   Explanation: No water bodies impacted by project

6. **Wetlands**

   Explanation: No wetlands in project area

7. **Groundwater and Aquifers**

   Explanation: Project will not adversely impact groundwater or aquifers

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

   Explanation: Project is consistent with current land use

9. **Visual Quality**

   Explanation: Project will not impact visual quality

10. **Air Quality**

    Explanation: Project will not impact air quality

11. **Noise**

    Explanation: Some temporary construction noise

12. **Human Health and Safety**

    Explanation: Project will not affect human health and safety

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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: work would take place on shared BPA and county ROW. Any necessary county permits or landowner coordination would be completed prior to construction.

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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/ Aaron Shurtliff  
Aaron Shurtliff  
Environmental Engineer  
Date: December 15, 2015