

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Snohomish County PUD Structure Replacement Project

**Project No.:** LURR20240218

**Project Manager:** Patrick Munyua, TERR-SNOHOMISH

**Location:** Snohomish County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.4 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Snohomish County Public Utility District (PUD) to replace an existing 115-kV transmission line structure (No. 1 0/1) located at BPA's Snohomish Substation.

Snohomish PUD's structure is comprised of three vertical wood poles: outer poles are 55 feet tall, the center pole is 45 feet tall, and a 36-foot-long wood crossarm beam. The in-kind replacement structure would be installed within about 15 feet of the existing structure and would also be a three wood-pole structure at the same heights. Each new pole would be embedded about 8 feet deep, and 6 new guy wires would be installed on the new structure. Snohomish County PUD's existing 115-kV conductor would be transferred to the new structure. The obsolete poles would be pulled out of the ground and the holes would be backfilled with soil obtained from the new holes created for the replacement structure. Construction equipment would access the work area via an existing gravel access road located on the south side of the Snohomish Substation.

**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.

Becky Hill  
Environmental Protection Specialist

Concur:

Katey C. 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:** Snohomish County PUD Structure Replacement Project (LURR20240218)

## **Project Site Description**

The project site is located at BPA's Snohomish Substation, which is located on the western outskirts of the city of Snohomish, Washington. The substation is about 500 feet east of Highway 9, north of residential neighborhoods and schools with sports fields, and directly south of a BPA rights-of-way easement maintained for low growing vegetation. The winding Snohomish River, which is designated critical habitat for Puget Sound Chinook salmon and Puget Sound steelhead, is located about 0.6 mile to the south of the substation, as well as about 0.7 mile to the west of the substation. An unnamed tributary, used by coho salmon for migration purposes, and its associated riparian corridor, are located about 0.2 mile west of HWY 9.

BPA GIS records indicate multiple small wetlands were delineated in 2015 on the BPA fee-owned property at the Snohomish Substation fee-owned property. A portion of a 0.32-acre emergent palustrine wetland was delineated within the project site. Other wetlands on the substation property are as close as 25 feet to the east, and 250 feet to the west. A substation expansion to the south in 2017 replaced a portion of 0.32-acre wetland with fill and large access road rocks. At that same time, a new drainage ditch was installed. The 2-foot-wide ditch parallels the substation's perimeter chain link fence, and it also passes between the poles of the Snohomish County PUD's structure that is proposed for replacement.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

Explanation: The BPA archaeologist initiated Section 106 consultation on August 26, 2024, with the Samish Indian Nation, the Sauk-Suiattle Indian Tribe, the Snoqualmie Indian Tribe, the Stillaguamish Tribe of Indians, the Swinomish Indian Tribal Community, the Tulalip Tribes, and the Washington Department of Archaeology and Historic Preservation (DAHP). In that same communication to the consulted parties, the BPA archaeologist determined that no historic properties would be affected due to the implementation of the proposed undertaking. DAHP responded on August 27, 2024, concurring with the archaeologist's determination; no responses were received from any other consulted parties.

Notes:

- Should any cultural resources be discovered during project activities, then all project work must stop in the area, and the cultural resources lead should be notified immediately. A Post-Review Discovery Procedure document with contact information for the BPA archaeologist would be supplied to Snohomish County PUD prior to commencing construction work.

## 2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Removal of the existing structure and installation of the new structure within about 15 feet of the existing structure would disturb about 2,500 square feet of soil. The replacement poles and guy wires would be installed up to 10 feet deep.

Notes:

- Test soils for hazardous materials, which if found, would be disposed of off-site according to local, state, and federal regulations.
- Implement standard construction-related Best Management Practices (BMPs) and a BPA-approved Erosion and Sediment Control Plan (ESCP) that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved revegetation plan as soon as practicable after disturbance.

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

Potential for Significance: No

Explanation: An area of about 2,500 square feet in size with a rocky and gravel substrate and moderate density of vegetation would be disturbed during project activities. The area is regularly mowed and maintained for low-growing vegetation. Plant species that could be damaged during project activities include native and non-native grasses, English plantain, Queen Anne's lace, clover, Himalayan blackberry, Scotch broom, and reed canary grass. Cattails and reed canary grass are growing in the drainage ditch. Disturbance areas would be reseeded after installation.

No special-status plant species or suitable habitat for special-status plant species are present within the project area. Therefore, the proposed action would have no effect on special-status plant species.

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

Potential for Significance: No with Conditions

Explanation: About 2,500 square feet of low-quality, regularly mowed vegetation would be disturbed as a result of the project. Temporary disturbance to wildlife (i.e. birds, small rodents, amphibians, and aquatic invertebrates) could occur from elevated noise and project activities in the area during construction. Because the work would be occurring adjacent to a currently operating substation, any wildlife present are used to human presence and noise.

No special-status wildlife species or suitable (terrestrial or aquatic) habitats are present within or near the project area. Therefore, the proposed action would have no effect on special-status wildlife species or habitats.

Notes:

- To minimize impacts to aquatic species and low-quality aquatic habitat associated with the drainage ditch, implement standard construction-related BMPs and a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.

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

Potential for Significance: No with Conditions

Explanation: No water bodies or special-status fish species are present within the project area, and the project area is not located within a floodplain. During construction, BMPs would prevent impacts to off-site waterbodies, floodplains, and special-status fish. The implementation of BMPs (i.e. sedimentation fencing) would also minimize potential impacts due to soil erosion and sedimentation into the drainage ditch. However, the proposed action may have a low impact on the perimeter drainage ditch and any water contained within due to potential sedimentation.

Notes:

- Implement a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved Stormwater Pollution Prevention Plan (SWPPP) during construction.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

## 6. Wetlands

Potential for Significance: No with Conditions

Explanation: BPA investigated the project area during the fall of 2024. No wetland features were detected in the project area. Since the 2015 delineation, the area has been altered by the addition of fill and large access road rock. During construction, BMPs would prevent indirect impacts to wetlands that are located nearby on the Snohomish Substation property but are located beyond the project area. Therefore, the proposed action would have no effect on wetlands.

Notes:

- Implement a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved SWPPP during construction.

## 7. Groundwater and Aquifers

Potential for Significance: No with Conditions

Explanation: Ground disturbance is unlikely to reach depths to groundwater and no new wells or other uses of groundwater or aquifers are proposed. BMPs would prevent impacts from unintended spills to groundwater or aquifers. Therefore, the proposed action would have no effect on groundwater or aquifers.

Notes:

- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The in-kind replacement of an existing 115-kV transmission line structure would not change the land use of the BPA Snohomish Substation property. No specially-designated areas are located within the project area.

## 9. Visual Quality

Potential for Significance: No

Explanation: The in-kind replacement of an existing wood-pole transmission line structure (i.e., same wood-pole heights, same materials, etc.) would not change the visual quality of the area surrounding BPA's Snohomish Substation.

## 10. Air Quality

Potential for Significance: No

Explanation: Construction activities would result in a minor and temporary increase in dust and vehicle emissions in the local area. BMPs, such as turning off vehicles when not in use, would be implemented to limit the amount of emissions released in the local area.

## 11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment and general construction activities would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7am to 7pm). Construction-related noise may be temporarily and intermittently audible from residences and an athletic field located within 500 to 600 feet of the project site. However, there would be no long-term or operational change in ambient noise levels following completion of the project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: Construction would be completed by trained professionals who would follow all applicable safety precautions as detailed in the site-specific Safety Plan, which would be maintained on-site during construction and updated, as needed. The public and non-construction related workers would not have access to the construction area, because it is located behind locked gates maintained by BPA. Work areas would be secured when construction crews are not present. Therefore, the proposed action would not be expected to impact human health and safety.

### **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

### **Landowner Notification, Involvement, or Coordination**

Description: The project would occur on BPA fee-owned land associated with the Snohomish Substation. The applicant would be responsible for notifying adjacent landowners prior to commencing work.

Signed:

Becky Hill  
Environmental Protection Specialist