

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Salem District Vegetation Management FY26 Bundle

PP&A No.: 6735

Project Manager: Chris Morse – Supervisory Natural Resource Specialist – TFBV-DOB-1

Location: Benton, Clackamas, Linn, Marion, and Washington counties, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021; USFS NEPA procedures 36 CFR 220.6[e] as adopted July 23, 2024): B1.3 Routine Maintenance; 2.(e)(12) Harvest of live trees not to exceed 70 acres...

Description of the Proposed Action: The Bonneville Power Administration (BPA) proposes to implement vegetation management activities to maintain low-growing vegetation communities within specific, localized areas in and adjacent to the following transmission line rights-of-way (ROW): Big Cliff-Detroit PH 1&2 No 1, Buckley-Marion No 1, Detroit-Santiam No 1, Detroit PH-Detroit No 1, John Day-Marion No 1, Jones Canyon-Santiam No 1, Keeler-Oregon City No 2, Ostrander-Pearl No 1, Pearl-Marion No 1, and Santiam-Toledo No 1,. These areas are situated across Benton, Clackamas, Linn, Marion, and Washington counties, Oregon. The necessity for these vegetation management actions was determined through comprehensive assessments, resulting in the development of Vegetation Control Cut Sheets for the respective ROW corridors and their associated access roads along these transmission facilities.

To comply with Western Electricity Coordinating Council standards, BPA proposes to use hand cutting, mowing, herbicidal treatment, or a combination of those methods to manage and maintain vegetation with the goal of removing tall-growing vegetation that is currently or will soon become a hazard to the transmission line (a hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an electrical arc, relay, and/or outage). The overall goal of BPA is to establish and maintain low-growing plant communities along the right-of-way to control the development of potentially threatening vegetation. Work would be done consistent with BPA's long-established vegetation management program, and all herbicide(s) and adjuvant(s) mixture selections would follow the minimization measures identified in the BPA List of Approved Herbicide Environmental Standards & Procedures (ESP)# E-VGM-004.

The corridors in the proposed project area measure approximately 100 feet to 400 feet wide and 200 miles long. Localized areas within an approximate 2,500 acres of ROW, 1.5 miles of access roads, and 240 structure sites of existing transmission line and access road rights-of-way would be initially treated in the fall and winter of 2025. Additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds or where BPA personnel discover vegetation that poses a hazard to the transmission line.

Herbicides would be selectively applied in accordance with their label instructions and BPA-listed buffer distances using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar) or localized treatments and cut stubble treatments) with chemicals approved by BPA to ensure that the roots are effectively controlled - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. A follow-up treatment of re-sprouting target vegetation would be conducted by fall of 2026. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line

In addition, BPA proposes to remove approximately 425 trees in, or adjacent to, the ROW and to remove limbs or top from approximately 70 trees in, or adjacent to, the ROW. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 200 miles of ROW. Trees and limbs would be hand cut to maintain the root system and all tree debris would be disposed of onsite, along the ROW, using on-site cut, lop and scatter, or chipping/mulching techniques.

No new access roads, skid trails, decking or staging areas would be needed for the work.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 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; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review. ¹

/s/ Steven Selser
Steven D. Selser
Physical Scientist (Environmental)

Concur:

/s/ Katey Grange
Katey C. Grange
NEPA Compliance Officer Date: October 29, 2025

Attachment(s): Environmental Checklist

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

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.

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Project Site Description

The corridors run through primarily private lands, but some tracts are managed by the US Forest Service, the Bureau of Land Management – Northwest Oregon District, the Confederated Tribes of Warm Springs, US Army – Corps of Engineers, Oregon Department of State Lands, and local government. Land use is varied, with urban, suburban, agricultural, forestry, commercial, industrial, and park/recreational uses present along the ROW corridors. The existing transmission rights-of-way are managed for low-growing vegetation species.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources (to be updated after CR review)

Potential for Significance: No with Conditions

Explanation: The proposed actions were found to have either no potential to cause effect (manual cut lop and scatter or herbicide application) or no adverse effect to historic properties based on the implementation of monitoring and/or pre-work surveys. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Confederated Tribes of the Warm Springs Reservation, the Confederated Tribes of Grand Ronde, the Confederated Tribes of Siletz Indians, the Cowlitz Indian Tribe, the Oregon State Historic Preservation Officer, the U.S. Army Corps of Engineers (USACE), the Bureau of Land Management (BLM), the U.S. Forest Service (Mt. Hood National Forest and Willamette National Forest), the Oregon Department of State Lands (ODSL), and the Oregon Parks and Recreation Department on September 29, 2025. No responses were received from these parties within 30 days. In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.

Notes:

- Monitoring would be required during tree cutting activities on the John Day-Marion No 1 from structure 76/1 to 76/2.
- Pre-work survey or monitoring would be required for tree cutting activities in the following line corridor spans:

Line Name	From Structure	To Structure
Jones Canyon-Santiam No 1	110/2	110/3

Jones Canyon-Santiam No 1	111/1	111/2
Jones Canyon-Santiam No 1	111/3	112/1
Jones Canyon-Santiam No 1	112/2	112/3
Jones Canyon-Santiam No 1	112/4	115/1
Jones Canyon-Santiam No 1	115/2	116/4
Jones Canyon-Santiam No 1	131/2	131/3
Jones Canyon-Santiam No 1	133/4	134/1
Buckley-Marion No 1	76/2	76/3
John Day-Marion No 1	77/1	77/2
John Day-Marion No 1	78/4	79/1
John Day-Marion No 1	80/3	80/4
John Day-Marion No 1	89/3	89/4
John Day-Marion No 1	90/2	90/3
John Day-Marion No 1	91/4	92/2
John Day-Marion No 1	95/4	96/1
John Day-Marion No 1	96/2	96/3
John Day-Marion No 1	130/6	104/1
John Day-Marion No 1	104/2	105/1
John Day-Marion No 1	109/4	110/1

2. Geology and Soils

Potential for Significance: No

Explanation: The proposed vegetation management actions do not result in ground disturbance.

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

Potential for Significance: No

Explanation: Site-specific treatment would be applied to maintain existing low-growing plant communities. Project activities would be limited to the already impacted transmission line and access road rights-of-way and would not substantially alter existing plant communities. Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads. BPA made a determination that the project would be consistent with scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BiOp) and letter of concurrence (LOC) regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. All terms and conditions and conservation measures identified in this consultation would be implemented. There would be *No Effect* to Endangered Species Act (ESA)-listed plant species. No impacts to state or federally sensitive species are anticipated because no known Federal or State listed species are known to occur in the action area.

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

Potential for Significance: No with conditions

Explanation: In general, the project would have a small impact to wildlife and habitat related to temporary disturbance associated with elevated equipment noise (chain saws and mowers) and human presence. Typically, this temporary disturbance would last less than an hour in any particular treatment segment. With the use of cut, lop, and scatter tree debris disposal, some small animal habitat would be created. Wildlife is anticipated to use adjacent habitat and return to the treatment area soon after the completion of work. Within the vicinity of project activities, BPA identified four species protected by the Endangered Species Act (ESA): the gray wolf, Marbled Murrelet, Northern Spotted Owl, and Streaked-horned Lark. The proposed action *may affect* but is *not likely to adversely affect* gray wolves. The proposed action would have *no effect* on critical habitat as there is no critical habitat for gray wolves in the action area. The proposed action *may affect*, and is *likely to adversely affect* Marbled Murrelet, and is *likely to adversely affect* Marbled Murrelet critical habitat. The proposed action *may affect*, and is *likely to adversely affect* Northern Spotted Owl, but is *not likely to adversely affect* Northern Spotted Owl critical habitat. The proposed action *may affect* and is *likely to adversely affect* Streaked-horned Lark but the proposed action is *not likely to adversely affect* Streaked-horned Lark critical habitat. BPA made a determination that the project would be consistent with scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BiOp) and letter of concurrence (LOC) regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. All terms and conditions and conservation measures identified in this consultation would be implemented. No impacts to state or federally sensitive species are anticipated because timing restrictions would be implemented as identified below.

Notes:

- Spans where Gray Wolf has been identified on the cut sheets, if a den is identified, or rendezvous site is discovered, timing restrictions between April 1 and July 15th would be observed.
- Spans where Northern Spotted Owl has been identified on the cut sheets timing restrictions between March 1 and September 30th would be observed.
- Spans where Marbled Murrelet has been identified on the cut sheets timing restrictions between April 1 and September 15 would be observed.
- Spans where Streaked-horned Lark has been identified on the cut sheets timing restrictions between April 16 and August 15 would be observed.

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

Potential for Significance: No

Explanation: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Cut Sheets. Appropriate herbicides would be used within these locations according to label instructions and applicable ESA consultation minimization measures, including buffer distances. Trees in riparian zones would be selectively cut to include only those that would grow into the minimum approach distances of the conductor at maximum sag, other trees would be left in place or topped to preserve shade. Shrubs that are less than 10 feet high would not be cut where ground to conductor clearance allows. No ground disturbance would occur and root systems would be left intact to prevent sedimentation. Any effects to ESA-listed fish are covered by BPA's programmatic biological agreement with the National Oceanic and Atmospheric Administration 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 (WCR-2014-1600, September 22, 2016).

BPA also conducted a review of ESA-listed bull trout populations, under the jurisdiction of the USFWS, that may be present in the project area. BPA determined that the project would be consistent with scope of activities and action area evaluated in the USFWS' BiOp and LOC regarding Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. Streams in the project area with documented presence of bull trout and designated bull trout critical habitat have been noted in the vegetation control cut sheets. All conservation measures identified in this consultation would be incorporated into the vegetation control cut sheets and other contract documentation.

6. Wetlands

Potential for Significance: No

Explanation: Wetlands may be present in the treatment areas. Herbicides would not be applied within wetlands and a buffer up to 100 feet would be established depending on treatment type, potential toxicity, or label advisory for ground or surface water. In those locations with wetlands, appropriate herbicides (mainly Garlon 3A) would be used up to the water's edge, but not over water. No ground disturbance, filling, or excavating of wetlands would occur.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No use of groundwater is proposed. Herbicide applications would be applied by licensed applicators and would follow label instructions to minimize the potential for groundwater contamination. Further, herbicides would not be applied within 50 feet of known groundwater wells and water sources.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur. No change to the use of these specially-designated areas would occur; however, project activities have the potential to temporarily disrupt recreating park users that may be present during vegetation management activities, but disruptions would likely last less than a day and alternate recreational areas would be available during the disruption.

9. Visual Quality

Potential for Significance: No

Explanation: All work would be performed within existing transmission line right-of-way. Vegetation management activities and techniques would be similar to what has occurred during prior prescribed management cycles; therefore, there would be a negligible change to the visual quality of the area.

10. Air Quality

Potential for Significance: No

Explanation: The project would have a limited, temporary impact on air quality from a small amount of vehicle and hand tool emissions and dust generated during vehicle movement.

11. Noise

Potential for Significance: No

Explanation: There would be temporary noise from vehicles and hand equipment that would occur intermittently and last a few hours in each area.

12. Human Health and Safety

Potential for Significance: No

Explanation: The project would remove potential vegetation hazards to the transmission lines, thus reducing outages and wildfire risk.

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: BPA has coordinated with public land managers and private landowners. No special measures or requirements were identified for treatments on federally managed lands. Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

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

Signed: /s/ Steven Selser

Steven D. Selser
Physical Scientist (Environmental)

Date: October 29, 2025