

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Vegetation Enhancement Project on Keeler-Oregon City No. 2

**Project No.:** LURR 20250050

**Project Manager:** Darin Smith, TERR-Chemawa

**Location:** Washington County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way, B1.3 Routine Maintenance

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow Clean Water Services (CWS) to access BPA fee-owned Right-of-Way (ROW) to plant, manage, and enhance native vegetation located between structures 10/11 and 10/10 of the Keeler-Oregon City No. 2 transmission line and structure 11/11 and 11/10 of the Oregon City-Stub-C transmission line located in Beaverton, Oregon. CWS proposes planting riparian species at a density of approximately 1,600 plants per acre; including species such as swamp rose (*Rosa pisocarpa*), Douglas spirea (*Spirea douglasii*), snowberry (*Symphoricarpos albus*), and other low-growing native shrub species, grasses and wildflowers. Species would be limited to have a maximum growth height of 8 feet and below. In the event that a species grows past the 8 foot requirement, CWS would be responsible for managing that plant's height compliance. No woody species would be planted within 50 feet of BPA transmission structures.

Work would include planting native seeds or cuttings and trash removal within the ROW near Beaverton Creek. CWS proposes to control non-native plant populations (i.e., yellow flag iris) through mechanical, hand removal, and herbicide treatment; they would measure project success over time through site monitoring and data collection. Equipment would include various hand tools, a small-engine brush cutter, and backpack sprayers. Trucks and ATVs may be used for transporting equipment and supplies to and from the project site. No large construction equipment would be required to complete the project, and no overnight equipment staging would take place within BPA ROW.

BPA authorizes the use of and manages its fee-owned lands pursuant to its authority under sections 2(e) and 2(f) of the Bonneville Project Act. 16 U.S.C. § 832a(e)-(f).

**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; 89 FR 34074, April 30, 2024), 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. <sup>1</sup>

Justin M. Olmsted  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> 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 DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, 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.

**Proposed Action:** Vegetation Enhancement Project on Keeler-Oregon City No. 2

## **Project Site Description**

The proposed action would take place within BPA fee-owned ROW located between structures 10/11 and 10/10 of the Keeler-Oregon City No. 2 transmission line and structures 11/11 and 11/10 of the Oregon City-Stub-C transmission line in Beaverton, Washington County, Oregon (Township 1 South, Range 1 West, Section 8). Beaverton Creek cuts perpendicularly through BPA ROW, with Tualatin Hills Nature Park located immediately to the northwest and Beaverton Creek Wetlands Natural Area located immediately to the east. A railroad is located on the eastern edge of the ROW. Vegetation within the ROW consists of native (i.e., Queen Anne's lace and cattails) and nonnative (i.e., Himalayan blackberry and yellow flag iris) species. The ROW consists of various grass species, while tree coverage includes both conifer and deciduous trees. The surrounding land use is a combination of industrial and urban development. A popular walking path is found on the northern side of the ROW which would be used for equipment transport.

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

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

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and implementing regulations 36 CFR 800, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO), Cowlitz Indian Tribe, and the Confederated Tribes of Grand Ronde on April 8, 2025.

The Oregon SHPO concurred with BPA's delineation of the Area of Potential Effects (APE) and concurred that there would be no historic properties affected for this undertaking on May 7, 2025. No other responses were received.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: The increased foot traffic would result in minor soil compaction during the planting process. CWS would plant cuttings or seeds directly into the soil to limit the amount of displaced soil during the planting process. These disturbances within the ROW would be temporary, and the resulting increase in native vegetation throughout the ROW would aid in soil stabilization. Overall, there would be no impact to geology and minimal impact to soils.

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

Potential for Significance: No with Conditions

Explanation: The removal of invasive plants would result in a temporary loss of vegetative cover, but these species would be replaced by native species suitable to riparian habitat. Incidental take of native plants may occur as a result of herbicide use; however, this would be mitigated by applying herbicide directly onto small patches of nonnative species or by spot spraying using a low volume and low pressure backpack sprayer. No federal or state special-status species have been observed within the project site. Overall, the proposed actions would have minimal impact to plant species within BPA ROW.

Notes:

- No use of backpack sprayers with wind speeds exceeding 10 miles per hour.
- Invasive plant species manually removed should not be allowed to enter waterways; rather, plants should be bagged and disposed of off-site.
- Boots, clothing, and equipment should be cleaned before entering the project site.

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

Potential for Significance: No

Explanation: Minor disruption of normal wildlife behavior in and around the project site could occur from increased human presence. To minimize impacts to wildlife, herbicide would not be applied in areas where there is evidence of wildlife activity (e.g. game trails, burrows, and nesting sites). Herbicide application should be carried out early in the morning before pollinators are actively searching for flowering plants. Removing flowering bodies of invasive plants following herbicide use would reduce the chance of pollinators being attracted to treated vegetation. Following the proposed activities, wildlife would be able to resume normal behaviors, and no impacts to Federal or state special-status species or their habitats are expected.

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

Potential for Significance: No with Conditions

Explanation: Beaverton Creek has suitable habitat for winter steelhead and Pacific lamprey. Under the Endangered Species Act (ESA), steelhead are an ESA-listed threatened species. Pacific lamprey is a federally listed Species of Concern and is also a listed sensitive species in Oregon. The increased riparian vegetation cover would benefit aquatic resources by reducing water temperature and contributing to the ecosystem's nutrient cycle. CWS would utilize the *Special Considerations* of their Integrated Pest Management Plan to reduce herbicide exposure to Beaverton Creek.

Notes:

- The applicant would only use BPA-approved aquatic-safe herbicides, and its use would follow the manufacturer's instructions and comply with all applicable laws.
- The applicant would hand pull yellow flag iris to the maximum extent possible. If needed, minimal herbicide treatments would be used.

#### **6. Wetlands**

Potential for Significance: No

Explanation: The sites would be accessed on foot and motorized vehicles used for transporting equipment and people would stay on the established paved path. Riparian seeds and cuttings would be pushed directly into the ground to limit disturbance to wetland soils. Overall, there would be minimal impact to the wetland.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Only aquatic-safe herbicide would be used and soil disturbance would not reach depths that could affect groundwater or aquifers. Therefore, the project would not impact groundwater or aquifers.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: The Westside Regional Trail at Beaverton Creek is located near the northern section of the project site. No changes to this trail or any existing land use or specially-designated areas are proposed with this project.

## 9. Visual Quality

Potential for Significance: No

Explanation: Visual quality may be temporarily impacted following the removal of invasive vegetation; however, the native species that would be planted would assume the visual appeal of the area and contribute to the natural appearance of the landscape. Trash removal would help reduce the degraded visual appearance from the walking trail. Overall, the proposed actions would have minimal impact to visual quality.

## 10. Air Quality

Potential for Significance: No

Explanation: Minor dust and vehicle emissions may be produced during worker and equipment transport to the work site. Herbicide treatments would be applied directly to targeted species and used with minimal wind conditions. Overall, impacts to air quality would be minimal and temporary.

## 11. Noise

Potential for Significance: No

Explanation: All work would be conducted during daylight hours and the majority of work would be completed by hand and by a motorized brush cutter. Tools will be transported by ATV and vehicles, but this would be very limited periods of time. Follow-up maintenance of the project site (i.e., monitoring, photography, and invasive vegetation control) is not expected to increase ambient noise levels.

## 12. Human Health and Safety

Potential for Significance: No with Condition

Explanation: Signage indicating herbicide use would be clearly posted at all access points for the project site. A non-hazardous indicator dye would be mixed with the herbicide to visually indicate which areas have been treated. Herbicide would not be used in areas adjacent to recreational paths and other areas of known human and pet use. Therefore, the project would not impact human health or 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: See #3 for invasive species management

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

Description: The ROW is BPA fee-owned. The applicant would be required to coordinate with any applicable landowners, as required.

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

Signed:

Justin M. Olmsted  
Environmental Protection Specialist