

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY26 Longview District Scheduled Vegetation Management Project

PP&A No.: 6753

Project Manager: Brian Luis – TFBV-ROSS MHQA

Location: Clackamas, Columbia, Multnomah, and Washington counties, Oregon, and Clark County, Washington

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: BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to the Big Eddy-Ostrander No.1, Knight-Ostrander No. 1, Ostrander-Troutdale No. 1, Rivergate-Keeler No. 1, Ross-St. Johns No. 1, and Paul-Allston No. 1 rights-of-way (ROW) in Clackamas, Columbia, Multnomah, and Washington counties, Oregon, and Clark County, Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridors and 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 between approximately 100 and 920 feet in width and approximately 103 miles in length. The proposed activities include the treatment of up to 1,560 total acres using localized selective hand cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 1,425 acres using localized herbicide applications. The proposed activities would also include treatment of approximately 76 acres of ROW, 13 miles of access roads, and 190 structure sites using a combination of mowing and herbicidal techniques. Initial treatments would begin in Fall 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 treatment) or localized treatments (basal treatment and/or low-volume foliar treatment) 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. For worker safety and fire prevention, broad-spectrum (non-selective) residual herbicide would be applied in a localized area beneath and immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). A follow-up treatment of re-sprouting target vegetation would be conducted by Fall 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 675 trees, and to remove limbs or tops from approximately 600 trees in, or adjacent to, the ROW. Tree clearing would occur across multiple, discrete locations dispersed throughout project area. 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 and C 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/ Oden Jahn

Oden Jahn

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: October 3, 2025

Attachment(s):

Environmental Checklist Sensitive
Species Conditions

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 corridor primarily runs through private lands, but some tracts are on land managed by United States Forest Service (USFS) – Mt. Hood National Forest, Bureau of Land Management – Northwest Oregon District, Oregon Department of State Lands, and the City of Portland's Bull Run Watershed and Forest Park. Approximately four miles of right-of-way (ROW) are on public and private lands within the Columbia River Gorge National Scenic Area, including the Sandy River Delta Natural Area, managed by the USFS. 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 to promote low-growing vegetation species.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO), the Washington Department of Archaeology and Historic Preservation (DAHP), the Cowlitz Indian Tribe, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of Grand Ronde, and the Confederated Tribes of Siletz Indians on August 27, 2025. The Washington DAHP concurred with the APE and the determination of no adverse effect on August 28, 2025. A confirmation of delivery was received from the Oregon SHPO on August 27, 2025. No other responses were received within 30 days.

Archaeological monitoring and/or pre-construction surveys would be performed in select spans, or for select activities, as noted in the vegetation control cut sheets.

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.

2. Geology and Soils

Potential for Significance: No

Explanation: No ground-disturbing vegetation management methods would be implemented, thus minimizing the risk for soil erosion.

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. The project would have no effect on Endangered Species Act (ESA)-listed plant species because there are none recorded in the project area. No impacts to state or federally sensitive species are anticipated because BPA would selectively target only tall-growing woody species and weeds.

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

Potential for Significance: No

Explanation: State Sensitive and Sensitive-Critical species have been observed in the vicinity of the project area and include: American pika, harlequin duck, painted turtle, fringed myotis, Pacific lamprey, northern red-legged frog, purple martin, Oregon slender salamander, Cascades frog, and Larch Mountain salamander. Work would be highly localized and temporary and effects are not anticipated to cause a decline in sensitive wildlife species populations. 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.

A species list was obtained from the United States Fish and Wildlife Service (USFWS) for federally-listed, proposed, and candidate species potentially occurring within the project boundaries. Based on the ESA review conducted, BPA made a determination that the project would be consistent with scope of activities and action area evaluated in the 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, and the BPA Southern Washington Periodic Vegetation Management LOC, Project Code FWS/R1/2023-0081437, dated August 15, 2023. All terms and conditions and conservation measures identified in these consultations would be incorporated into the vegetation control cut sheets and other contract documentation.

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) occurring in the project area are noted in the vegetation control cut sheets. Herbicide buffers, up to 100 feet, would be established depending on treatment type, potential toxicity, or label advisory for ground or surface water. No aquatic treatments would be conducted. As conservation and avoidance measures where sensitive aquatic species or habitats are present, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered fish species or critical habitat. 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 preserved 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.

BPA conducted a review of ESA-listed anadromous fish species and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). BPA determined the proposed vegetation management activities are within the scope of activities and action area evaluated in the 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 (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, and/or identified as EFH have been noted in the vegetation control cut sheets. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

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' 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. 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 occurring in the project area are noted in the vegetation control cut sheets. 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. No ground disturbance, filling, or excavating of wetlands would occur.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: All water used for the proposed project would be obtained from permitted sources. Air gaps or backflow prevention devices would be utilized to prevent potential water source contamination. Herbicide applications would be applied by licensed applicators and would follow label instructions to minimize the potential for groundwater contamination. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the vegetation control cut sheets, no herbicide application would occur within a 50-foot radius of the wellhead, spring, or irrigation source (164 feet when using herbicides with ground/surface water advisory).

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: No change in land use would occur. Sections of the project's ROW corridors are within the Columbia River Gorge National Scenic Area and Sandy River Delta Natural Area (also known as Thousand Acres), managed by the United States Forest Service; as well as the Bull Run Watershed managed by the Portland Water Bureau, and Forest Park, managed by the City of Portland. No change to the use of these specially-designated areas would occur; however, project activities have the potential to be visible to recreating park users that may be present during vegetation management activities but are not expected to displace or significantly disrupt park users. Additionally, noxious weeds are an identified concern in the Bull Run Watershed and the surrounding area. BPA would comply with all applicable Bull Run Watershed Standard Operating Procedures when working within the watershed and would coordinate with Portland Water Bureau staff to inspect equipment entering the watershed.

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 project activities.

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. Herbicides would be applied by licensed applicators in accordance with the label instructions and BPA-approved herbicides to limit the potential for public or worker exposure. Trees would be cleared by contractors who are qualified to work around electrical facilities to minimize the risk of trees falling into the lines and causing injury or wildfire. Approximately five trees would require side-limbing in Forest Park. BPA and BPA's contractor would coordinate with Portland Parks and Recreation staff to develop a plan to ensure that park users are clear of work areas during the short periods of work near park roads and trails.

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 Columbia River Gorge National Scenic Area and USFS Mt. Hood National Forest. No special measures or requirements were identified for treatments on USFS-managed lands. The Portland Water Bureau – Bull Run Watershed was also notified via email. 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/ Oden Jahn

Oden Jahn
Physical Scientist (Environmental)

Date: October 3, 2025