

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Ashe-Marion No. 2 Access Road Improvement and Slide Prevention

PP&A No.: 6711

Project Manager: Ariel Kramer – TELF-TPP-3

Location: Clackamas County, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B1.3 Routine Maintenance

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes repairing and improving approximately 4.8 miles of shared USFS/BPA access roads for the Ashe-Marion No. 2 high voltage transmission line in Clackamas County, OR.

Actions would include grading and adding rock to the previously established access roads as well as approximately 0.4 miles of reconstruction. BPA would also install a new cross drain culvert, clean and repair an existing culvert by adding riprap to the inlet and outlet, install two new gates, and construct several new drain dips and water bars along the access roads. The project would also improve several spur roads to other structures in the area.

Access beyond line mile 198 was impaired by a large active and slow moving landslide which severed the main access road, resulting in a long detour to reach line mile 199. BPA proposes to repair the slide area near Blister Creek which would entail filling in the hillside that was eroded away with stones or riprap to re-establish and stabilize the slope.

No tree removal or other work is planned at this work location.

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/ Julianna Martin

Julianna Martin

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange

NEPA Compliance Officer

Date: October 14, 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.

Proposed Action: Ashe-Marion No. 2 Access Road and Slide Prevention Project

Project Site Description

The Ashe-Marion No. 2 Access Road Improvement and Slide Prevention Project (Project) is located in the Cascade Mountains in central Oregon, located within Mt. Hood National Forest. The Project Area is in the Western Cascades Montane Highlands ecoregion. The region has a moist, temperate climate that supports highly productive coniferous forests of mountain hemlock, Pacific silver fir, and various fir and pine species. This region has lower temperatures and receives more snow than lower-lying surrounding regions and has relatively small glacier lakes present.

Transmission Line/ROW	Structure #	Township	Range	Section	County, State	Ownership
Ashe-Marion No. 2	196/1-199/4	7S	5E	10, 14-17	Clackamas, OR	USFS

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: On August 11, 2025, BPA initiated consultation with the Confederated Tribes of Grand Ronde Community of Oregon, the Confederated Tribes of the Warm Springs Reservation of Oregon, Mt. Hood National Forest, though BPA is the lead federal agency, and the Oregon State Historic Preservation Office (SHPO). On August 11, 2025, Oregon SHPO assigned the project SHPO Case No. 25-1133. Oregon SHPO concurred with no effect to historic resources determination on September 8, 2025. No other responses were received.

Notes:

- If any Post-Review cultural resources are inadvertently discovered during construction, crews are required to stop work within 30 meters of the find and must call the cultural resources lead for appropriate next steps. Refer to BPA's Inadvertent Discovery Protocol.

2. Geology and Soils

Potential for Significance: No with Conditions

Explanation: Ground disturbance includes the installation of riprap and stones for slope stabilization in line mile 198 as well as access road improvement actions such as grading and the installation of drainage features.

Notes:

- BPA would implement best management practices (BMPs) to address temporary erosion and sediment control.

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

Potential for Significance: No

Explanation: Project activities would have very little impact on local vegetation. The work is planned to occur on and immediately adjacent to existing gravel access roads. Some vegetation in ditching may be impacted during maintenance, but BPA would reseed any disturbed soils and stabilize soils to promote revegetation. There are no ESA or sensitive plant species in the project area.

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

Potential for Significance: No with Conditions

Explanation: BPA obtained an official species list for the project area from U.S. Fish and Wildlife Service on June 11, 2025. The Ashe-Marion No. 2 Access Road Improvement and Slide Prevention Project location is within northern spotted owl designated critical habitat and near historical northern spotted owl nest locations. The northern spotted owl nesting period is generally March 1st – September 30th, but the late nesting period is defined as July 16th – September 30th, when juvenile northern spotted owl have greater mobility and are able to avoid disturbances and disruptions. BPA has consulted with USFS biologists regarding effects to northern spotted owl. Planned construction activities fall under the USFS' programmatic Biological Assessment for Routine Land Management Activity. BPA has determined that the project "may effect but is not likely to adversely" northern spotted owl. BPA has determined that the project will have "no effect" on other ESA-listed species in the project area. No sensitive species were identified in the project area.

Notes:

- BPA would complete work on the project during the late nesting period; July 16th – September 30th.

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

Potential for Significance: No

Explanation: There are no waterbodies in the project area.

6. Wetlands

Potential for Significance: No

Explanation: There are no wetlands in the project area.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No excavation is planned for the project and all work would not be at a depth that would potentially disrupt groundwater or impact local aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: Land use is federally managed forests lands for timber, habitat, and recreation. There are no specially-designated areas present. Construction activities may temporarily impact

travel on BPA shared roads during the course of construction. Existing land use would not be impacted after project activities are completed.

9. Visual Quality

Potential for Significance: No

Explanation: The project would include some minor changes to the slide area in order to stabilize open soil with the inclusion of stones and rip rap. Once the slope is stable and revegetated, it would not affect the visual quality of the project site

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. There would be no long-term change in air quality following completion of the project.

11. Noise

Potential for Significance: No

Explanation: Some temporary noise may be generated due to construction activity. However, the project is located in a remote area and construction noise would not be significant.

12. Human Health and Safety

Potential for Significance: No

Explanation: Work crews would follow appropriate safety precautions. Final site conditions would be consistent with existing conditions.

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: USFS was notified of the work and met with BPA on February 5, 2025, to discuss the project. A SF-299 was submitted by BPA to the USFS on August 12, 2025.

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

Signed: /s/ Julianna Martin

Julianna Martin

Physical Scientist (Environmental)

Date: October 14, 2025