# **Categorical Exclusion Determination**

Bonneville Power Administration
Department of Energy



**Proposed Action:** Covington District FY26 Vegetation Management

**PP&A No.:** 6751

**Project Manager:** Jason Hunt – TFBV-Covington

**Location:** King, Pierce, and Thurston counties, WA

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

<u>Description of the Proposed Action:</u> BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to the Covington-Duwamish No 1, Covington Creston SCL No 1, Maple Valley-Duwamish No 1, Covington-Maple Valley No 1, Raver-Echo Lake No 1, Tacoma-Raver No 1, Raver-Covington No 1, Chehalis-Covington No 1, Covington-Bettas Road No 1, Raver-Paul No 1, and Olympia-Grand Coulee No 1 rights-of-ways in King, Pierce, and Thurston counties, 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 herbicide applications would follow the minimization measures identified in the BPA list of approved herbicide environmental standard and procedures E-VGM-004.

The corridors in the proposed project area measure approximately 100 to 500 feet in width and extend over about 110 miles in length. Localized areas within an approximate 2,750 acres of existing transmission line and access road rights-of-way would be initially treated in the fall 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 using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar) or localized treatments (broadcast application and cut stubble treatments) with chemicals approved by BPA to ensure that

the roots are killed - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure.

In addition, BPA proposes to remove approximately 300 trees and limb 275 more. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 110 miles of rights-of-way. Trees and limbs would be hand cut to maintain the root system and all tree debris would be disposed of onsite, along the right-of-way, using on-site lop and scatter, or 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. <sup>1</sup>

<sup>&</sup>lt;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 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.

/s/ <u>Jonnel Deacon</u>

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey C. Grange
NEPA Compliance Officer
Date: October 20, 2025

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: Covington District FY26 Vegetation Management

## **Project Site Description**

The project area is located in the Puget Sound and Cascade foothills region of western Washington. The work areas are existing transmission line rights-of-ways that are primarily in rural residential, private timber, and Washington Department of Natural Resources - managed lands. 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

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, BPA initiated consultation with the Muckleshoot Indian Tribe, the Snoqualmie Indian Tribe, the Nisqually Indian Tribe, the Puyallup Tribe of Indians, King County, Pierce County, Washington State Parks, and the Washington Department of Archaeology and Historic Preservation (DAHP) on September 17, 2025. DAHP concurred with the APE and the determination of no adverse effect on September 22, 2025. No other responses were received 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.

## 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 the existing low-growing plant communities. There would be no effect to Endangered Species Act (ESA)-listed plant species. No impacts to state or federally sensitive species are anticipated because the proposed work would be to maintain an existing right-of-way similar to how it has been maintained for the last 60 years and non-native and incompatible native species would only be targeted with treatment. Further, no state or federal species have been documented within the project boundary or within 1 mile of the work areas. 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. Herbicides would be applied locally to target species and would not be broadcast sprayed.

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

Potential for Significance: No

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. The project would have no impacts to state or federally listed sensitive species.

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

Potential for Significance: No

Explanation: The project crosses several waterbodies that support ESA-listed salmon and designated critical habitat, including Cedar, Green, and Nisqually rivers, and is also located within several floodplains. Appropriate herbicides would be used within these locations according to label instructions and applicable ESA consultation minimization measures, including buffer distances. 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 (WCR-2014-1600).

#### 6. Wetlands

Potential for Significance: No

Explanation: No documented wetlands occur within the project area, but wetlands may be present. 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

<u>Explanation</u>: No change in land use would occur. No specially-designated areas are present in the work areas. No disruption to the use of DNR-managed lands would occur.

#### 9. Visual Quality

Potential for Significance: No

<u>Explanation</u>: All work would be performed within existing transmission line right-of-way. Vegetation management would be similar to what has happened historically on a 3-year cycle; therefore, there would be a negligible change to the visual quality of the area.

## 10. Air Quality

Potential for Significance: No

<u>Explanation</u>: The project would have a small, 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

<u>Explanation</u>: 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 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.

## **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**

<u>Description</u>: BPA has coordinated with DNR. No special measures or requirements were identified for treatments on DNR-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/ Jonnel Deacon Date: October 17, 2025

Jonnel Deacon

Physical Scientist (Environmental)