

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: FY26 Olympia Vegetation Management

PP&A No.: 6752

Project Manager: Jason Hunt – TFBV-COVINGTON

Location: Cowlitz, Lewis, Thurston, Pierce, Grays Harbor, and Kitsap counties, 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...; 3.(e)(13) Salvage of dead and/or dying trees not to exceed 250 acres...

Description of the Proposed Action: BPA proposes to maintain low growing vegetation communities in specific, localized areas in and adjacent to six transmission line corridors containing the Lexington-Longview No 2, Longview-Chehalis No 1 & 3, Paul-Allston No 2, Longview-Allston No 4, Napavine-Allston No 1, Chehalis-Centralia No 1, Olympia-St Clair No 1, Olympia-Grand Coulee No 1, Olympia 500/230kV Tie No 1, Kitsap-Bangor No 1, Kitsap-Station X No 1, Satsop-Aberdeen No 2 & 3, and Satsop Park-Cosmopolis No 1 rights-of-way (ROW) in Cowlitz, Lewis, Thurston, Pierce, Grays Harbor, and Kitsap 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.

Corridor	Transmission Line	Spans
CHMH_LONG-CHEH-1	Lexington-Longview No 1	LEXI – LONG
CHMH_LONG-CHEH-1	Lexington-Longview No 2	LEXI – LONG
CHMH_LONG-CHEH-1	Longview-Chehalis 1&3 No 1	LONG – 12/2
CHMH_PAUL-ALSN-2	Paul-Allston No 2	PAUL – 46/1
CHMH_PAUL-ALSN-2	Longview-Allston No 4	1/6 – 1/7
CHMH_PAUL-ALSN-2	Napavine-Allston No 1	NAPV – 35/5
CHMH_PAUL-ALSN-2	Chehalis-Centralia No 1	CHEH – 6/8
CHMH_PAUL-ALSN-2	Lexington-Longview No 1 & 2	6/4 - LONG
CHMH_PAUL-ALSN-2	Longview-Chehalis 1&3 No 1 & 3	LONG – CHEH
OLMH_OLYM-GCOU-1	Olympia-St Clair No 1	OLYM – 14/4
OLMH_OLYM-GCOU-1	Olympia-Grand Coulee No 1	OLYM – 22/1
OLMH_OLYM-GCOU-1	Olympia 500/230kV Tie No 1	OLYM – OLYM
OLMH_KTSA-BNGR-1	Kitsap-Bangor No 1	KTSA – BNGR
OLMH_KTSA-PSNX-1	Kitsap-Station X No 1	KTSA – PSNX
OLMH_SATS-ABER-2	Satsop-Aberdeen No 2	SATS – ABER
OLMH_SATS-ABER-2	Satsop-Aberdeen No 3	SATS – ABER

Table 1. Corridor spans proposed for treatment.

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 to 600 feet. Localized areas within an approximate of 335 miles of ROW, 1.1 miles of access roads, and 95 structure sites of existing transmission line and access road rights-of-way would be initially treated in the fall 2025 through fall 2026. 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 December 31, 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 20 danger trees (DT) and 20 corridor trees (CT) in, or adjacent to, the ROW and approximately 30 trees would be side-limbed or topped in, or adjacent to, the ROW. Tree clearing would not be concentrated and occur in multiple, discrete locations within the 335 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 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 or Appendix 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/ Brenna Blankenship
Brenna Blankenship
Biological Scientist (Environmental)

Concur:

/s/ Katey Grange
Katey C. Grange
NEPA Compliance Officer Date: October 20, 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: FY26 Olympia Vegetation Management

Project Site Description

Work would occur in managed low growing vegetation communities in Cowlitz, Lewis, Thurston, Pierce, Grays Harbor, and Kitsap counties, Washington.

The corridors in the proposed project area range in width from approximately 100 to 600 feet and extend over roughly 335 miles. The work areas are existing transmission line ROWs that are primarily in private lands, but some tracts are managed by the State of Washington, Washington Department of Natural Resources (WA DNR), and United States Army (Joint Base Lewis-McChord). Land use is varied with urban, suburban, rural-residential, agricultural, forestry, recreation, commercial, and industrial uses present along the ROW corridors.

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 Cowlitz Indian Tribe, the Port Gamble S'Klallam Tribe, the Skokomish Indian Tribe, the Confederated Tribes of the Chehalis Reservation, the Suquamish Tribe, the Nisqually Indian Tribe, the U.S. Army, and the Washington State Department of Archaeology and Historic Preservation (DAHP) on September 19, 2025. Washington State Department of Archaeology and Historic Preservation (DAHP) concurred with the APE and the determination of no adverse effect on September 19, 2025, as did the Nisqually Tribe on October 13, 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 with Conditions

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. There would be "No Effect" to Endangered Species Act (ESA)-listed plant species, such as the Kincaid's lupine. The following best management practices would be implemented to protect the federally listed Kincaid's lupine within its habitat range.

No impacts to state or federally sensitive species are anticipated because no state or federally sensitive listed species were identified in the project area.

Notes:

- All work that may result in ground crushing or disturbance would be conducted between August 15 and February 28.
- Keep vehicles on access roads.
- Mower deck height must be greater than 6 inches.

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. There would be "No Effect" to the following ESA-listed wildlife species; Columbian white-tailed deer, Marbled Murrelet, Northern spotted owl, streak horned lark, yellow-billed cuckoo, and Roy Prairie pocket gopher. The "No Effect" determination would be in conjunction with the described best management practices in the attached Effects Determination.

The proposed vegetation management activities are within the scope of activities and project area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) regarding the Olympia-Grand Coulee Vegetation Management Project (01EWF00-2017-I-1023), sent to BPA in September 2017, in conjunction to the listed conservation measures described in the LOC. Based on the proposed action in the Biological Assessment, the USFWS concurred with BPA that the proposed project "may affect, and is not likely to adversely affect" Olympia pocket gopher, Yelm pocket gopher, Oregon spotted frog, and designated critical habitat for Oregon spotted frog.

No impacts to state or federally sensitive species are anticipated because no state or federally sensitive species were identified in the project area.

Notes:

- Follow the conservation measures and terms and conditions identified during the ESA consultation.

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

Potential for Significance: No with Conditions

Explanation: Appropriate herbicides would be used near waterbodies according to label instructions and applicable minimization measures, including buffer distances. No ground disturbance would occur, and root systems would be left intact to prevent sedimentation.

Pursuant to its obligations under the Endangered Species Act (ESA), BPA made the determination that the projects activities would have “No Effect” to bull trout or bull trout critical habitat. Bull trout are known to inhabit several rivers within the project area including the Nisqually, Chehalis, Columbia, and Wishkah Rivers, with associated critical habitat. Identified Essential Fish Habitat (EFH) rivers and streams are within the project area, including the Columbia River, Delameter Creek, Newaukum River, Deschutes River, and others. By using the measures identified below, this project is not expected to alter or affect existing habitat and/or distribution.

Any effects to anadromous ESA-listed fish are covered by BPA's programmatic biological opinion 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).

Notes:

- Follow the conservation measures and terms and conditions identified during the ESA consultation.
- All vegetation removal would be restricted to above ground, leaving root systems intact and therefore retaining bank stability.
- When possible, all shrubs and all herbaceous material less than 10 feet in height, excluding noxious weeds such as scotch broom, would be left untouched.
- Trees in sensitive and/or riparian areas would be left in place or topped, whenever possible to preserve existing shade conditions.
- On slopes greater than 20%, there would be no use of ground disturbing equipment.
- If it is necessary to manage vegetation within riparian areas and/or near sensitive water resources along the project corridor, buffer zones would be used as follows:
 - For ESA/EFH-containing streams, ponds, wetlands, or other sensitive water resources, only hand cutting and treatment with Triclopyr TEA (Garlon 3A) would be used in spot and localized applications the water's edge and 100 feet on either side of the resource. Use of practically non-toxic to slightly toxic herbicides, other than Triclopyr TEA (Garlon 3A), between the water's edge and three feet from the water's edge is not permitted.
 - For non-sensitive water resources, only hand cutting and treatment with BPA-approved practically non-toxic to slightly toxic herbicides, such as Triclopyr TEA (Garlon 3A), would be used in spot and localized applications between the water's edge and 35 feet on either side of the resource.

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 specially-designated areas are present in the work areas. No disruption to the designated use of State of Washington, Washington Department of Natural Resources (WA DNR), or United States Army (Joint Base Lewis-McChord) managed lands would occur.

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. 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.

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 private landowners, the State of Washington, Washington Department of Natural Resources (WA DNR), and United States Army (Joint Base Lewis-McChord). No special measures or requirements were identified for treatments on State of Washington, Washington Department of Natural Resources (WA DNR)-managed lands, and United States Army (Joint Base Lewis-McChord). 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/ Brenna Blankenship
Biological Scientist (Environmental)

Date: October 20, 2025