

Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



Proposed Action: FY2026-2031 Short-term Power Marketing

Project Manager: Mark Simpson, PTF-5; Eric Federovitch, PTL-5

Location: Portland, Oregon

Categorical Exclusion Applied (from 10 C.F.R. Part 1021): B4.1 Contracts, policies, and marketing and allocation plans for electric power; B4.4 Power marketing services and activities

Description of the Proposed Action: Bonneville Power Administration (BPA) proposes to continue routine short-term power marketing actions to maintain reliability, optimize economic outcomes, and meet the Agency's environmental responsibilities under diverse market conditions. These short-term power marketing actions include transactions to buy and sell power, transmission capacity, and associated ancillary services, with transaction durations not to exceed five years.

BPA's short-term power marketing would be conducted through actions like (but not limited to) contracts with other individual entities, public requests for offers, and participation in organized markets. Short-term marketing actions would be conducted between BPA and a wide variety of generation facilities, transmission system operators, and utilities throughout the Western Interconnection. The volume, duration, and types of transactions would be driven by BPA needs and would be consistent with sound business practices, BPA policies and procedures, and the directives of the Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act)(16 U.S.C. § 839 *et seq.*).

BPA would comply with all applicable federal laws and regulations governing these short-term power marketing actions. All short-term power marketing actions considered under this review would use only the existing transmission system and existing generation resources operating within their normal operating limits. There would be no new construction or modifications to existing facilities and infrastructure. Any proposed marketing actions which would fall outside of this scope would undergo separate, individual environmental review by BPA staff.

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

Thomas DeLorenzo
Environmental Policy Analyst

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Evaluation

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 Evaluation

This evaluation 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

BPA is headquartered in Portland, Oregon, and primarily markets power from 31 federally owned hydroelectric projects on the Columbia River and its tributaries, one non-federal nuclear power plant, and a small collection of other non-federally operated resources. Short-term power marketing actions would be coordinated by staff primarily in Portland and involve the use of generation facilities and transmission infrastructure throughout the Western Interconnection, the power and transmission grid that encompasses the western United States, British Columbia and Alberta in western Canada, and a small area of Baja California in Mexico.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have any potential to affect historic and cultural resources.

2. Geology and Soils

Potential for Significance: No

Explanation: The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect geology and soils.

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

Potential for Significance: No

Explanation: There are thirteen Endangered Species Act (ESA)-listed plant species and many more state special-status plant species present throughout BPA's service territory. The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to cause new effects on plants.

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

Potential for Significance: No

Explanation: There are seventeen ESA-listed wildlife species and numerous other state special-status species present throughout BPA's service territory. The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect wildlife.

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

Potential for Significance: No

Explanation: There are eight ESA-listed fish species present throughout BPA's service territory. The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect fish and waterbodies.

6. Wetlands

Potential for Significance: No

Explanation: Wetlands are present throughout BPA's service territory. The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect wetlands.

7. Groundwater and Aquifers

Potential for Significance: No

Explanation: No actions are proposed which would interact with groundwater and aquifers. The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect groundwater and aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: BPA owns and operates more than 15,000 miles of transmission lines and markets the power from 31 federally owned hydroelectric dams on the Columbia River and its tributaries, one non-federal nuclear power plant, and a small number of other non-federal resources. Ownership and operation of these facilities and infrastructure would not change. Parties with which BPA would conduct short-term power marketing activities are a variety of utilities, transmission system operators, and other groups which own, operate, and market

electricity and services from existing generation facilities across the existing electrical grid. BPA's short-term power marketing actions would not involve any changes in ownership or use of these facilities and infrastructure.

9. Visual Quality

Potential for Significance: No

Explanation: The proposed short-term marketing actions involve administrative, strategic, and financial activities intended to maintain system reliability, optimize economic outcomes, and meet BPA's environmental obligations in a wide range of market conditions. These marketing actions would use the existing transmission grid and generating resources operating within their normal operating limits. Marketing actions would not require new construction or modifications to existing facilities, nor any earthmoving which would have the potential to affect the aesthetic quality of the region.

10. Air Quality

Potential for Significance: No

Explanation: All power marketing actions would use only the existing transmission system and existing generation resources operating within their normal operating limits. While many of these facilities can typically cause impacts on local air quality, short-term power marketing would not cause changes to the operation of these facilities beyond their typical operating limits. As a result, there would be no new effects on air quality.

11. Noise

Potential for Significance: No

Explanation: All power marketing actions would use only the existing transmission system and existing generation resources operating within their normal operating limits. While many of these facilities can typically cause impacts on local noise levels, short-term power marketing would not cause changes to the operation of these facilities beyond typical effects. As a result, there would be no new effects on noise levels.

12. Human Health and Safety

Potential for Significance: No

Explanation: All personnel would use best practices to ensure human health and 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: N/A

Landowner Notification, Involvement, or Coordination

Description: BPA would coordinate with contracting parties as appropriate. BPA would also engage in all legally mandated public engagement processes necessary for contracting actions.

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

Signed:

Thomas DeLorenzo
Environmental Policy Analyst